

## **APPENDIX P**

### **COMMENTS RECEIVED ON DRAFT EIS/EIR**

#### **HOW TO USE APPENDIX P, COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) AND DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) AND APPENDIX Q, RESPONSE TO COMMENTS**

All comments received during the official comment period are provided in this Appendix P. All responses to comments are provided in Appendix Q.

Within each comment letter or oral statement from the public hearing, brackets are used to identify the specific items commented on within each comment letter or oral statement. The bracketed comments in each letter are labeled by number to provide an identifier for each comment. Comments were organized into 26 topical categories as follows:

<b>Comment Topic</b>	<b>Description</b>
1	Purpose and Need
2	Aviation Forecast
3	Alternatives
4	Noise
5	Land Use
6	Socioeconomic
7	Secondary
8	Air Quality
9	Water Quality
10	Section 4(f)
11	Historic
12	Fish, Wildlife, and Plants
13	Wetlands
14	Floodplains
15	Energy/Public Services
16	Light
17	Redwood Landfill
18	Construction
19	Safety
20	Runway Performance/Wind
21	Transportation
22	Cumulative
23	General
24	Support of Project
25	No Comment
26	Soils



For all comments the first digit is the Comment Topic. The second digit behind the decimal is the specific comment within that topic. Each comment submitted was reviewed, summarized, and identified with a Comment Topic from one of the categories above.

For example Comment 2.1 was "The runway extension = larger/more aircraft at DVO." This issue was commented on by several individuals and organizations including in written comments by USEPA, Marin Audubon Society, Marin Conservation League, Black Point Improvement Club, Bonner, Dunadio, Gilkerson, Gilkerson and Nebb families, Levy, Pack, Silveira family, Weber and Ross, Weber, in the public hearing by Knecht for Gness Field Community Association, Wells, Gilkerskon, Pack, Bracey, Nebb, Spofford, and Capretta. In every letter/comment this specific comment is identified as Comment 2.1 and is addressed in Appendix Q *Responses to Comments* in the response to Comment 2.1

Comment letters and oral comments in this appendix appear in the following order:

- Federal agency comments
- State agency comments
- Local agency comments
- Organizations
- Individuals
- Transcript of January 10, 2012 on Public Hearing

This appendix includes agency, organization and individual comments that were received during the public comment period on the Draft Environmental Impact Statement and the Draft Environmental Impact Report. The public comment period extended from December 9, 2011 to February 6, 2012 and including a public hearing to receive comments on January 10, 2012. During the public comment period a total of 169 separate comment letters and oral comments were received, but the total number of commenters was less than 169 as some commenters who submitted written comments also provided oral comments at the public hearing and/or submitted or cosigned more than one written comment letter. Comments were received from Federal, State, and local agencies, organizations, and individuals.

Readers interested in all responses to public comments can review Appendix Q *Response to Comments* in its entirety. Readers only interested in responses to specific comment letters or statements can use the listing below to review the Appendix Q *Response to Comments* for responses to all comments received from a specific commenter in the order they were made in the commenter's letter.



<b>Name</b>	<b>Organization (if any)</b>	<b>Date</b>	<b>Comment Numbers</b>
Kathleen Martyn Goforth	U.S. Environmental Protection Agency	2/6/2012	3.1, 3.2, 3.7, 1.1, 3.2, 3.2, 1.3, 13.1, 13.2, 3.2, 13.3, 13.2, 14.3, 3.2, 14.3, 19.1, 5.1, 19.1, 5.1, 7.1, 7.1, 2.1, 7.1, 4.2, 3.4, 3.5
Gregor Blackburn	Federal Emergency Management Agency (FEMA)	12/21/2011	14.1, 14.2, 14.9, 14.10, 14.11,
Gary Arnold	California Department of Transportation (CDOT)	12/19/2011	21.1, 21.2, 21.3, 21.3
Carl Wilcox	California Department of Fish and Game	1/9/2012	23.1, 12.1, 12.2, 12.3, 3.6, 12.4, 12.5, 5.1, 12.7, 12.8, 12.8, 12.9, 13.5, 13.6, 13.7, 13.8, 13.9, 13.10, 14.4, 14.5, 14.6, 14.7
LTC Kenneth M. Koop	California Air National Guard (CANG)	1/12/2012	No Comments
Mark Janofsky	County of Marin (MARIN)	2/6/2012	5.1, 5.2, 5.3, 17.1, 17.2, 17.1, 17.3, 17.4, 17.5, 5.4, 17.1, 17.4, 17.5, 17.3, 17.6, 17.7, 17.8, 17.7, 9.2, 17.2, 17.1, 17.7, 17.1, 17.1, 17.9, 17.6, 17.7, 17.8
Osha R. Merserve	RLI	2/6/2012	23.4, 23.8, 5.2, 5.2, 5.2, 5.9, 17.5, 17.7, 17.7, 17.10
Chris DeGabriele	North Marin Water District (NMWD)	12/6/2011	9.1
Elizabeth Dunn	City of Novato	2/6/2012	4.3, 4.4, 6.1, 6.2, 6.3, 22.1, 19.2, 23.2
Robert Patterson	City of Petaluma	2/3/2012	4.1
Susan Stompe	Marin Conservation League (MCL)	2/6/2012	2.1, 13.2, 13.11, 14.3, 14.3, 14.8, 4.3, 4.5, 9.3, 9.4, 13.11, 2.1, 4.2, 4.5, 10.1, 19.3
Barbara Salzman and Phil Peterson	Marin Audubon Society (MAS)	2/6/2012	23.3, 3.7, 3.6, 5.5, 2.2, 2.3, 19.2, 20.2, 2.4, 20.6, 26.1, 4.6, 5.1, 5.6, 12.10, 10.2, 13.3, 13.12, 12.6, 13.13, 13.11, 13.11, 13.14, 13.15, 3.8, 2.1, 2.3, 2.5, 13.7, 5.7, 13.2, 26.2, 26.2, 26.2, 26.2, 13.16, 12.11, 13.12, 13.15, 13.11, 13.11, 13.17, 13.11, 13.12, 12.12, 13.11, 12.13, 13.3, 18.1, 4.7, 13.11
Board of Directors	Gnoss Field Community Association (GFCA)	2/4/2012	24, 4.18, 4.18, 2.6, 2.6, 20.13, 2.1, 2.1, 22.2, 2.1, 2.1, 2.6, 4.18, 19.4, 4.20, 4.18,
C. Henry Barner	Black Point Improvement Club (BPIC)	1/4/2012	2.3, 23.5, 2.1, 23.6, 4.5
Wright Bass	Bass	1/10/2012	4.10, 20.5, 4.11, 4.12, 19.4, 16.1, 19.4
Jacqueline A. Bonner	Bonner	2/6/2012	4.5, 3.9, 3.10, 2.1, 3.2



<b>Name</b>	<b>Organization (if any)</b>	<b>Date</b>	<b>Comment Numbers</b>
David Donadio	Donadio	1/10/2012	2.1, 4.8, 4.5
Jim Duckworth	Duckworth	2/3/2012	24, 19.4, 19.4, 20.4, 19.4, 4.9, 4.9, 24
Christopher Gilkerson	Gilkerson	2/6/2012	1.6, 1.4, 20.1, 3.3, 2.1, 4.14, 4.8/4.13, 4.5/4.15, 1.6, 20.1, 1.3, 1.8, 20.8, 20.11, 20.10, 20.9, 20.8, 20.10, 20.12, 3.9, 3.2, 3.3, 2.1/2.2, 4.2a, 4.2, 4.14, 4.5/4.15, 4.21, 5.1/5.6, 13.19, 3.2, 3.2, 3.12, 3.13, 14.3, 14.3, 23.4
Dr. Richard Levy	Levy	2/6/2012	4.5, 16.2, 2.1, 1.5, 3.2, 4.13, 4.5, 3.3, 2.1, 20.1, 22.2
Edward A. Mainland	Mainland	2/5/2012	14.3
Rod Mehrten	Mehrten	1/22/2012	24
Steven Nebb	Nebb		3.2, 20.9, 2.1, 2.1, 20.8, 1.3, 1.7, 20.9, 3.3, 20.9, 20.10, 20.8, 20.12, 3.2, 3.5, 4.17
Robert Pack	Pack		1.3, 2.1, 19.5, 19.5, 1.3, 20.7, 19.6, 1.3, 1.4, 3.11
Charles Roell	Roell	1/10/2012	20.4, 4.9, 19.4
Barbara Rozen	Rozen	1/7/2012	13.18, 12.4, 10.3
Anthony and Lorraine Silveira	Silveira Ranches	2/3/2012	4.16, 2.1, 5.8, 23.7
Jeannette Weber, Duncan and Betsy Ross, Leslie Weber	Ross/Weber	2/6/2012	2.1, 1.5, 3.2, 4.13, 4.5, 3.3, 2.1, 20.1, 22.2
Leslie and Chris Weber	Weber	2/6/2012	20.8, 3.3, 3.2, 3.3, 2.1, 2.1, 4.8, 3.10, 4.2, 23.4, 4.2
Joyce B. Wells	Wells	1/12/2012	19.4
Steven Knecht	Gnoss Field Community Association (GFCA)	1/10/2012	24, 4.18, 4.19, 22.2, 2.6, 2.7, 2.1, 19.4
Susan Stompe	Stompe	1/10/2012	20.3, 2.1, 13.20, 14.3
Joyce Wells	Wells	1/10/2012	19.4
Jackie Bonner	Bonner	1/10/2012	1.5, 4.5, 4.13, 4.8, 3.3, 2.1, 20.1, 22.3
Christopher Gilkerson	Gilkerson	1/10/2012	1.6, 1.4, 20.1, 3.2, 3.3, 2.1, 4.14, 2.1/2.2,
Rob Pack	Pack	1/10/2012	1.3, 1.4, 19.5, 2.1, 1.2
Clarence Bracey	Bracey	1/10/2012	4.8, 4.13, 5.10, 5.1, 2.1, 4.8
Steven Nebb	Nebb	1/10/2012	1.5, 20.9, 20.9, 3.3, 20.11, 20.10, 20.1, 1.3, 1.7, 2.1, 4.8



<b>Name</b>	<b>Organization (if any)</b>	<b>Date</b>	<b>Comment Numbers</b>
Bob Spofford	Spofford	1/10/2012	2.1, 23.9
Patricia Capretta	Capretta	1/10/2012	2.1, 19.7, 4.5
Dr. Richard Levy	Levy	1/10/2012	4.5, 16.2
Rich Elb	Elb	1/10/2012	4.5, 19.4, 4.19
Kirk Heiser	Heiser	1/10/2012	4.22, 19.4, 4.9



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USEPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

February 6, 2012

Mr. Doug Pomery  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835

Subject: Draft Environmental Impact Statement (DEIS), Gross Field Airport Proposed Extension  
of Runway 13/31, Marin County, California (CEQ # 20110410)

Dear Mr. Pomery:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The project proposes to extend the runway at Gross Field to accommodate a small percentage of corporate jets that are restricted from operating at maximum gross takeoff weight under hot weather and other adverse weather conditions. Approximately 12 acres of wetlands would be filled and 23 acres of wildlife habitat lost. Based on our review, we have rated the DEIS's proposed actions as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions").

The project will require a Clean Water Act Section 404 permit, and we are concerned that, because the project purpose was narrowly defined, practicable alternatives that would have fewer adverse impacts on the aquatic ecosystem were not evaluated (40 CFR 230.10(c)). We recommend that FAA consider and evaluate a modified preferred alternative that would include a shorter runway extension. This modified alternative would reduce impacts to wetlands, wildlife habitat, and the floodplain. This additional consideration would also address the NEPA requirement to rigorously explore and objectively evaluate all reasonable alternatives, as well as the alternatives analysis requirement of the Executive Order on Floodplain Management.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CHD-2). If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions  
EPA's Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantive changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policies and Procedures for the Review of Federal Actions Impacting the Environment



## Wetlands – Compliance with Clean Water Act Section 404

### Alternatives analysis under Section 404(b)(1)

The DEIS integrates the requirements for the Clean Water Act Section 404 permit into the NEPA process and we commend FAA for this integrated approach. It is important that the preferred NEPA alternative correspond with the least environmentally damaging practicable alternative (LEDPA) under CWA Section 404 because, as the DEIS notes, the LEDPA is the only alternative that the Army Corps of Engineers will permit. The DEIS states that Alternative B is the LEDPA (p. 5.10-11).

We are concerned that all practicable alternatives were not evaluated because the project purpose was narrowly defined. The project sponsor's stated purpose is to allow existing aircraft at DVO to operate at maximum gross takeoff weight under hot weather and other adverse weather conditions (p. 2-1). Elsewhere in the DEIS, the identified purpose is to provide the necessary runway length for existing users to move efficiently use the airport (p. 5.11-5). The alternatives analysis required under CWA Section 404 must comply with the Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230) (Guidelines). The Guidelines require that there exist no practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem (40 CFR 230.10(a)). Alternatives that would increase efficiency without extending the runway at DVO by 1,100 feet were not evaluated, including shorter runway extensions that would avoid fill of valuable wetlands.

**Recommendation:** We recommend that FAA consider and evaluate in the Final EIS a modified preferred alternative that would include a shorter runway extension. We note that an extension to 3,700 feet would accommodate all B-1 aircraft landings (DVO is a B-1 airport) in all adverse weather conditions, and would provide additional runway for take-offs for some business jets in hot day conditions, thereby improving efficiency for these aircraft.

Additionally, the Final EIS should revise the statement that the current runway available at DVO is "insufficient to serve a majority of the airport's fleet mix under most conditions"<sup>1</sup>. We recommend adding the actual number of each type of aircraft utilizing DVO that are listed in Figures 3 and 4, and in the evaluation of the alternatives, identify the number and percentage of these aircraft flights that would benefit from the extension. This information is important for the decision-maker who must evaluate the trade-offs of flights benefiting from the proposed action<sup>2</sup> against its environmental costs (loss of 12 acres of wetlands, 23 acres of wildlife habitat, and possible increased noise impacts to residents).

### Compensatory mitigation

The DEIS identifies potential mitigation alternatives as (1) use of the SF Bay National Wildlife Refuge, (2) offsite restoration on a private nearby parcel, or (3) offsite restoration through the SF Bay Joint Venture (p. 5.10-13-14). None of these opportunities are currently approved CWA 404 mitigation banks or in lieu fee programs. Therefore the airport will not be able to "purchase credits" as stated in the DEIS. The sites listed may be suitable for mitigation, but a mitigation proposal containing all the elements listed at \$230.94 of the 2008 Mitigation Rule will need to be submitted to the Corps and EPA for review and approval.

<sup>1</sup> Based on Figures 3 and 4 in Appendix D, this does not appear to be true.

<sup>2</sup> A small percentage of flights (not days only for 8% of aircraft) - Appendix E, p. 9

13.2

The DEIS states that a 1:1 mitigation ratio for replacing lost wetland acreage would be utilized (p. 5.10-13). The final mitigation ratio will be determined by the Corps and, depending on the specific proposal, may need to be higher than 1:1 to ensure no net loss of wetland acreage and function. The Draft Environmental Impact Report cites the Marin Countywide Plan Policy BIO-3.2 which requires, where avoidance of wetlands is not possible, that wetlands be mitigated at a minimum of 3:1 replacement ratio for off-site mitigation (DEIR, p. 4.19-11).

3.2

**Recommendation:** Further explore the avoidance of wetlands fill by evaluating a shorter runway extension alternative or explain why it is not practicable. We recommend that a conceptual mitigation proposal be included in the FEIS. Commit to at least a 3:1 mitigation ratio for replacement of lost wetland acreage as required by the Marin Countywide Plan Policy BIO-3.2.

13.3

13.2

### Floodplain/Climate Change Effects

Executive Order 11998 directs federal agencies to preserve floodplain natural and beneficial values, requiring an analysis of practicable alternatives to locating in the base floodplain. The proposed project is located entirely within the 100-year floodplain with additional hazard associated with storm waves (Exhibit 5.11-1) and would result in a floodplain loss of 13 acres (an additional 13 acres of land being protected by a levee) (p. 5.11-6). The DEIS concludes that there would be no adverse impacts on natural and beneficial floodplain values (p. 5.11-6). Increased flooding potential due to climate change effects do not appear to have been considered in the analysis; however, nor are there indications that sea level rise is being considered in project planning (i.e. climate change adaptation). The airport site elevation is close to sea level (p. 4-9).

14.3

3.2

**Recommendation:** The FEIS should identify why a shorter extension that substantially meets the purpose and need and impacts floodplain values to a lesser degree is not practicable.

14.3

Assess potential climate change effects, including increased flooding and sea level rise, on the project. Identify whether project features are needed to adapt to a changing climate, and if so, what these features are (e.g. higher levees) and what impacts from these project features would be. Because of an increased potential for flooding from climate change, it is appropriate to pursue an approach that ensures floodplains are preserved as much as possible.

### Bird-aircraft strike/impacts to pilot safety

The DEIS does not discuss pilot safety and there is no health and safety chapter in the DEIS. The CEQ regulations direct agencies to consider the degree to which the proposed action affects public health or safety (40 CFR 1508.27(b) 2). This is important for this project because the DEIS states that the proposed action could be inconsistent with FAA bird-strike hazard mitigation guidance (p. 3-16) because the runway would be extended closer to the landfill northeast of the airport which is a bird-attractant, but no further discussion of this issue is included.

19.1

5.1

19.1

**Recommendation:** We recommend that the FEIS include an assessment of potential impacts to pilot and public safety. Discuss the FAA bird-strike hazard mitigation guidance in the context of the project and any increased risk of bird strikes from extending the runway closer to the landfill.

5.1



#### 7.1 Noise impacts from growth inducement:

The analyses in the DEIS does not consider the increased demand for B-II and other larger jets that a runway extension could cause. The DEIS states that the proposed runway extension would not change the operating levels or fleet mix at DVO (p. 5.1-4, 6). The rationale for this assumption is that the runway to taxiway separation would remain the same and that this presents a limitation to larger planes operating at DVO (p. 5.4-1). This statement does not address the likely increase in proportion of business jets that currently use DVO (and currently experience weight limitations) that could occur with the proposed extension. Removing the limitations that the larger jets experience would incentivize a greater use of these jets at DVO. This is confirmed in a tenant letter from the Kelleher Corporation, included in Appendix D, that states that "the future plans for aircraft upgrades would be completely dependent upon a longer runway", and "with the proposal of adding additional length to Gnosss Field runway, the concept of the Kelleher Corporation acquiring a larger Gnosss field-based aircraft is once again possible". This clearly shows that a reasonable response to a longer runway is a change in fleet mix proportions towards larger aircraft. In addition, a local newspaper article online<sup>3</sup> quotes a former DVO tenant saying that the "extension would also open the airport to some jet aircraft, such as the Learjet and Beechjet lines, that require longer runways"<sup>4</sup>. This also points to an expected change in fleet mix proportion.

This change is a growth-inducing effect that may result in additional impacts, yet it was not evaluated in any of the analyses in the DEIS. A recent court case affirmed that the Department of Transportation must evaluate actions that improve the efficiency of an airport as growth-inducing effects falling under the purview of 40 C.F.R. § 1508.8(b)<sup>5</sup>. This is especially relevant to noise impacts, about which many residents at the public hearing expressed concerns.

2.1 **Recommendation:** Conduct a demand forecast based on the longer runway proposed for the alternatives. Utilizing this information, evaluate the indirect effects on environmental resources and communities from the increased demand. Update the noise impact assessment to reflect any anticipated increases in aircraft size or in the proportion of larger aircraft currently using DVO.

#### 3.4 Evaluation of Off-site Alternatives - use of other airports

\* In the discussion of the use of other airports for evaluating off-site alternatives, the DEIS compares other airport runways to "the stated need of 4,400 ft" (p. 3-4, 3-7, 3-8, 3-9, 3-10). Because the additional 400 feet identified for Gnosss is site-specific, this discussion should have evaluated these other airports in terms of 4,000 ft, not 4,400.

\* This discussion repeatedly states that the primary population served by DVO is located south of DVO (p. 3-4, 3-7, 3-8, 3-9). The FEIS should include data to support this, especially since the evaluation cites commute emissions by car as a factor for dismissing these alternatives. If possible, the FEIS should provide the locations of the populations utilizing the aircraft that are currently experiencing limitation (for which the project is proposed to benefit). Since this user group is less than 10% of the users of DVO, a survey should be possible.

<sup>3</sup> See <http://www.msnjmi.com/about/19432905>

<sup>4</sup> He continues: "A lot of operators use 4,000 feet as a minimum (runway length) for certain classes of airplanes," said Drehan, who was previously head of Sunset Aviation, a former charter operation that once kept up to 15 planes at Gnosss Field.

<sup>5</sup> *Barnes v. U.S. Dept. of Transportation*, 655 F.3d 1124 (9th Cir. 2011). While this case involved the addition of a new runway, a longer runway that could increase demand would have similar induced growth effects.



# Federal Emergency Management Agency FEMA

RECEIVED

DEC 27 2011

Marin County  
Department of Public Works

U.S. Department of Homeland Security  
FEMA Region IX  
1111 Broadway, Suite 1200  
Oakland, CA, 94612-4052



FEMA

December 21, 2011

Mr. Doug Pomeroy  
U. S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard  
Brisbane, California 94005-1835

Dear Mr. Pomeroy:

This is in response to your request for comments on Gness Field Airport Proposed Extension of Runway 13/31 Draft Environmental Impact Statement and Draft Environmental Impact Report.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Marin (Community Number 060173), and City of Novato (Community Number 060178), Maps revised May 4, 2009. Please note that the City of Novato, Marin County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- 14.1 All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- 14.2 If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

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14.9

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

14.10

Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shm>.

## Please Note:

14.11

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Novato floodplain manager can be reached by calling Glenn Young, City Engineer, at (415) 899-8949. The Marin County floodplain manager can be reached by calling Berenice Davidson, Associate Civil Engineer, at (415) 499-3770.

If you have any questions or concerns, please do not hesitate to call Michael Hornick of the Mitigation staff at (510) 627-7260.

Sincerely,

Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

cc:

Glenn Young, City Engineer, City of Novato  
Berenice Davidson, Associate Civil Engineer, Marin County  
Ray Lee, WREA, State of California, Department of Water Resources, North Central Region Office  
Michael Hornick, Floodplanner, CFM, DHS/FEMA Region IX  
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

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State of California - The Natural Resources Agency  
 DEPARTMENT OF FISH AND GAME  
 Bay Delta Region  
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## California Department of Fish and Game

EDMUND G. BROWN JR., Governor  
 CHARLTON H. BONHAM, Director



January 8, 2012

Mr. John Roberto  
 County of Marin  
 3501 Civic Center Drive, Room #308  
 San Rafael, CA 94903

Dear Mr. Roberto:

Subject: Marin County Airport - Gross Field, Extension of Runway 13/31, Draft Environmental Impact Report, SCH #2008072037, Marin County

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (EIR) for the Marin County Airport - Gross Field, Extension of Runway 13/31 (Project). DFG is providing comments on the draft EIR as a Trustee Agency and Responsible Agency. As Trustee for the State's fish and wildlife resources, DFG has jurisdiction over the conservation, protection, and management of the fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species for the benefit and use by the people of California.

DFG is also providing comments as an adjacent land owner of the Burdell Unit of the Petaluma Marsh Wildlife Area.

The Project proposes to extend runway 13/31 from its current length of 3,300 feet to a total length of 4,400 feet with Runway Safety Areas (RSA's) that meet current Federal Aviation Administration (FAA) guidelines. The Project will also extend the corresponding taxiway to the full length of the runway, realign the drainage channels to drain the extended runway and taxiway, extend levees to protect the area from flooding, and re-program the Navigational Aids that pilots use to land at the airport to reflect the extended runway.

The Project site is located within an area of reclaimed tidal marshlands that was part of the formerly extensive marshes present around the San Pablo Bay. The Project area is adjacent to and lies within the original flood plain of the Petaluma River. The area is surrounded by levees and a DFG pump is used in the wet season to keep the area, including the airport, from flooding. Two major biological communities occur within the immediate vicinity of the Project area: annual grassland and high brackish marsh vegetation. These habitat communities support various special-status species including fully protected species.

*Conserving California's Wildlife Since 1870*

Mr. John Roberto  
 January 9, 2012  
 Page 2

### General Comments

23.1 The draft EIR does not appear to include complete contact information for the Lead Agency representative(s). The draft EIR did not present the current status of state listed species that use the habitat on-site. It should be clearly stated and analyzed throughout the document that the California clapper rail and salt marsh harvest mouse are fully protected species protected under Fish and Game Code Sections 3511 and 4700.

12.1

12.2 Similarly, page 4.5-32 states that a white-tailed kite was observed foraging in the Detailed Study Area. A discussion of this fully protected species should be included in the EIR and the Project design and mitigation measures should be revised to avoid all impacts to this species.

12.3 Please be advised that under law DFG cannot authorize take of a fully protected species. "Take" means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. Therefore, the Project should avoid any actions that may result in take of these species. Appropriate mitigation measures to ensure complete take avoidance of these fully protected species must be implemented.

3.6

Maps and/or figures should be included that show the proposed relocation of all drainage channels. The draft EIR states that the replacement "ditch/canal system would extend around the new runway and taxiway extensions and would serve the same hydrologic function as the existing ditch/canal, which is to collect surface water and to transport it west to east across the site towards the Petaluma River." There are no figures that identify the location of the new channel(s).

### Wildlife Resources

The draft EIR did not adequately address and analyze potential impacts to migratory wildlife corridors, page 4.5-17 identified the following significance criteria:

12.4 "Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites."

12.5 Impacts associated with this significance criterion were not fully addressed. The presence of the nearby DFG Wildlife Area and adjacent open space habitat should be discussed and impacts should be analyzed and disclosed. The extension of the runway by 1,100 feet has the potential to create more wildlife conflicts as native resident and/or migratory species move through the area.

5.1 Impacts associated with current and future bird strike incidents should also be disclosed. The proximity of the airport to the surrounding habitat areas and the forecasted increase in airport use, (Appendix C: Aviation Activity Forecast) will likely result in greater bird strike incidents. This impact should be disclosed in the EIR.



- 13.2 Consistent with Marin Countywide Policy BIO-3.2, DFG recommends that wetland impacts (11.83 acres) and their associated habitat potential for California clapper rail and salt marsh harvest mouse be mitigated off-site at a 3:1 ratio (created/preserved/impacted). The draft EIR also identifies 16.05 acres of temporary impact area that will result from construction staging. Since construction will take place over an estimated two-year period, DFG considers this a *semi-permanent* impact and requests that mitigation be proposed for this impacted area.
- 13.4
- 12.6 Since burrowing owls, a California Species of Concern, have been documented on-site, protocol level breeding season surveys should be conducted a season before any projected related activities occur. This protocol survey will be used to establish baseline site data for mitigation purposes and to guide future pre-construction surveys.
- 12.6 The California Burrowing Owl Consortium (Consortium) survey protocol specifies a multi-phase approach, which is recommended in order to adequately evaluate burrowing owl use of an area and to inform the California Environmental Quality Act (CEQA) process. Phase 1 of the protocol begins with a habitat assessment that recognizes that burrows are the essential component of burrowing owl habitat and that burrowing owls may use man-made structures as burrows. If suitable habitat [appropriate vegetation and burrow(s) or burrow surrogate(s)] is present, then a Phase 2 intensive burrow survey is necessary even if owl sign is not present during the habitat assessment phase. Owl sign includes molted feathers, cast pellets, prey remains, egg shell fragments or excrement at or near burrow entrance or perch site. During the intensive burrow survey phase, burrow concentration areas should be mapped. Phase 3 of the protocol requires four survey visits whether or not owl sign is observed during Phase 2. For this project, DFG recommends that the Consortium survey protocol for breeding season surveys be adhered to (four survey visits spread evenly (roughly every three weeks) during the peak of the breeding season, from April 15 to July 15). The habitat assessment, intensive burrow surveys and burrowing owl surveys should include the area within 150 meters of the Project boundaries (approximately 500 feet).
- 12.6 Pre-construction surveys (usually initiated during the non-breeding season) are necessary for assessing owl presence at a site within a short time period before site modification is scheduled to begin. The pre-construction surveys are intended to document if colonizing owls have recently moved onto the site, or if burrow locations of resident owls have changed, or if young of the year are still present and have not yet fledged or dispersed. Because any one or all of these events may have occurred on-site since the breeding season (protocol) surveys were completed, it is important to also complete the pre-construction surveys in order to avoid direct take of owls or their nests and to design proper minimization and mitigation measures (e.g., document number and reproductive status of resident owls and location of satellite burrows, establish buffer zones and equipment/personnel travel routes and work/storage areas).

- 12.6 Initial pre-construction surveys should be conducted outside of the owl breeding season (from February 1 to August 31) but as close as possible to the date that ground-disturbing activities will begin, to avoid the problem of waiting until March or April when the project would be delayed if owls are detected.
- 12.6 The number of pre-construction surveys necessary to accurately detect current owl presence and owl locations will be driven by a number of interacting criteria such as: 1) the time period that has elapsed since the last breeding survey was completed; 2) height and density of vegetation that may obscure owl presence; 3) topographical conditions that may obscure owl presence; 4) time of year (e.g., in the winter owls are more cryptic and spend more time in their burrows); 5) time of day and weather conditions when surveys are conducted; 6) long-term history of owl use at the site; 7) size of the parcel and degree of coverage by walking or by intensive observations via spotting scope, and 8) tolerance of owls to human presence. Generally, at a minimum, four survey visits on at least four separate days will be necessary, especially given the cryptic nature of this species during the non-breeding season.
- 12.6 Biologists conducting pre-construction surveys should expend enough effort, based on the above criteria, to assure with a high degree of certainty that take of owls will not occur once site modification and grading activities begin. The full extent of pre-construction survey effort must be described and mapped in detail (e.g., dates, time periods, area(s) covered, and methods employed) in a biological report. Current vegetation and topographical conditions and their corresponding effect on visibility should also be described. The report should be submitted to DFG for review.
- DFG recommends including the following changes to proposed Mitigation Measure 4.5-3; as shown in knockout and underline format:
- 12.7 Mitigation Measure 4.5-3: If burrowing owls are identified during surveys, compensate for permanent impacts to nesting, occupied and satellite burrows and burrowing owl habitat such that the habitat acres, number of burrows and burrowing owls impacted are replaced. Compensatory habitat should be 1) provided by permanent conservation of similar vegetation communities that provide for burrowing owl nesting, foraging, wintering, and dispersal habitat (i.e., during breeding and non-breeding seasons) comparable to or better than those of the impact area, 2) of sufficiently large acreage and/or connected to other conserved areas to help ensure site viability, and 3) permanently protected through fee title acquisition deemed to a non-profit conservation organization or public agency with a conservation mission, and a conservation easement assigned to a third party (non-profit or agency) for the purpose of conserving natural habitat and prohibiting activities incompatible with burrowing owl use. Additionally we recommend a mitigation land management plan be developed and implemented to address long-term ecological sustainability and maintenance of the site for burrowing owls and to fund management through the establishment of a long-term funding mechanism such as a non-wasting endowment. Marin County shall abide by



CDFG's recommendation that at least 6.5 acres of foraging habitat for burrowing owl to be preserved and protected in perpetuity for each active burrow that would be impacted by project activities. The mitigation area shall be approved by CDFG.

In order to determine the presence and location(s) of active burrows prior to construction, a pre-construction clearance survey shall be conducted no more than 30 days prior to the onset of construction. The time lapse between surveys and site disturbance should be as short as possible and will be determined by DFG based on specific project conditions but generally should not exceed 7 days. Additional surveys are necessary when the initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project area. Burrowing owls can be present during all times of the year in California, so this survey shall be completed even if the initiation of construction is outside of the typical February 1 to August 31 migratory bird breeding season. If active owl burrows are located during the pre-construction survey, a 250-foot buffer zone, or as determined appropriate by a qualified biologist in consultation with CDFG, shall be established around each burrow, with an active nest until the young have fledged and are able to exit the burrow. Any occupied burrows should not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFG verifies through non-invasive methods that either: a) the birds have not begun egg laying and incubation, or b) that juveniles from the occupied burrows are foraging independently and are capable of independent survival. In the case of occupied burrows without active nesting, active burrows after the young have fledged, or if development commences after the breeding season (typically February 1 to August 31), passive relocation of the birds should be performed. Passive relocation involves installing a one-way door at the burrow entrance, which encourages the owls to move from the occupied burrow. CDFG does not recommend any burrow closure when it can be avoided. CDFG should be consulted prior to any proposed burrow closure for current guidelines and methods for passive relocation of any owls found on the site.

DFG recommends including the following changes to proposed Mitigation Measure 4.5-4, as shown in strikeout and underline format:

**Mitigation Measure 4.5-4.** In order to minimize potential impacts to nesting birds' vegetation, removal shall be scheduled, to the greatest extent possible, during non-nesting seasons (September 1 to January 31). If vegetation removal has to occur during the typical nesting season (February 1 to August 31), special precautions for identifying species and nests should be taken. A wildlife specialist shall conduct a pre-construction survey for nesting birds if vegetation removal is scheduled close to the nesting season. A focused survey for active bird nests shall be conducted by a qualified biologist within 15 days prior to vegetation clearing. If an area identified for clearance has not been surveyed within the past 15 days, then a new survey shall be conducted. If nests are observed, the wildlife specialists qualified biologist shall determine appropriate buffer distances in consultation with CDFG, provide

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recommendation as to how the nests can be relocated without harm to the birds. If nests cannot be relocated avoided, construction activity shall be prohibited in the vicinity of the nest until the fledglings are gone and there are no attempts to re-nest.

Fish and Game Code § 3503.5 states it is unlawful to take, possess, or destroy any birds in the orders of Falconiformes or Strigiformes (birds-of-prey or raptors) or take, possess, or destroy the nest or eggs of any such bird. Fish and Game Code § 3503 states that is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird.

#### Hydrologic Resources

There appears to be a discrepancy in the level of impact to aquatic habitat. The Biological Assessment (BA) that was prepared in support of the environmental documentation identifies 2.38 acres of aquatic habitat permanently impacted (Appendix I). Section 4.5 of the draft EIR identifies permanent impacts to 0.15 acres to depressional seasonal wetlands, 0.59 acres of perennial drainage, and 1.57 acres of ditch/canal. No combination of these three aquatic habitat types identified in the draft EIR is consistent with the BA. This discrepancy needs to be clarified and the level of impact needs to be clearly disclosed.

The Project should be designed to include compensatory mitigation to offset all losses to waterways, including linear and area measurements. The draft EIR states that the new ditch/canal would result in an increase in overall length but would result in a net decrease in area. The draft EIR does not include a summary of measurements, including length and areas, or include any figures or images to support this statement. Figures and charts should be prepared to summarize the existing and proposed drainage features on-site.

The draft EIR states that impacts to jurisdictional ditch/canal will be 'replaced in kind' on-site in an amount that would be at a minimum of 2:1. It is not clear which agencies jurisdictional area is being replaced at a 2:1 ratio. DFG does not consider the construction of 0.77 acres of drainage ditch around the north end of the runway to be 'in kind'. Both linear and area impacts should be mitigated for the 2.38 acres of impacted aquatic habitat.

The Project is proposing to relocate the on-site drainage channel and ditch. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, DFG may require a Lake and Streambed Alteration Agreement (LSAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of an LSAA is subject to CEQA. DFG, as a responsible agency under CEQA, will consider the CEQA document for the Project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the LSAA notification process, please access our website at <http://www.dfg.ca.gov/habcom/1600/>, or to request a notification package, contact the Lake and Streambed Alteration Program at (707) 944-5520.

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14.4 The proposed Project will increase the area of non-permeable ground within the airport footprint. The localized hydrology in the project area will be altered, creating greater overland flows from precipitation across the site. The BA states that "this physical situation will presumably result in longer standing wetlands from the cut-off of localized downslope hydrology. The physical alteration of the landscape would predicate the need to increase ditch capacity or increase the pump duration times during winter periods when precipitation is removed from the site." Since the constructed drainage ditch will have less capacity, the pump will need to be operated for a greater amount of time. The impacts associated with the increase in pump operation should be analyzed and mitigation should be proposed.

14.5 The pump is operated and paid for by DFG. All pumping costs needed to reduce the flood threat to the airport, should be agreed to between the airport and DFG to address pumping costs, maintenance and replacement costs of the pumps.

14.6 Additionally, the draft EIR does not include a discussion of levee roads and/or routes that currently provide access to DFG's pump station that is used to prevent the area from flooding. This Project could restrict vehicle access to the pump station. Without direct vehicle access to the pump station, property damage from flooding could result in an emergency situation. An improved and dedicated direct access route should be created as part of this Project. Levee maintenance and repair should also be included as mitigation.

14.7 DFG believes that a meeting between the two entities should take place to resolve access issues, pumping costs, and levee maintenance.

If you have any questions, please contact Mr. Timothy S. Dodson, Environmental Scientist, at (707) 944-5513 or by email at [dodson@dfa.ca.gov](mailto:dodson@dfa.ca.gov), or Mr. Scott Wilson, Environmental Program Manager, at (707) 944-5584.

Sincerely,



Carl Wilcox  
Regional Manager  
Bay Delta Region

cc: State Clearinghouse



# California Air National Guard CANG

RE: e-mail confirming that the California Air National Guard has no comments on the Gross Field Airport Runway Extension Draft EIS/EIR  
Koop, Kenneth M LTC NGCA (u) Douglas Pomeroy

01/12/2012 01:54 PM

Doug, thanks for the quick response. We (the California National Guard) have reviewed the Draft Environmental Impact Statement/Environmental Impact Report, Gross Field Airport, Proposed Extension of Runway 13/31, and have no comments.

LTC Kenneth M. Koop  
Deputy Director  
Environmental Programs  
California National Guard  
Kenneth.Koop@us.army.mil  
916-369-4331

and

Operations Officer  
100th Troop Command  
California Army National Guard

-----Original Message-----  
From: Douglas.Pomeroy@faa.gov [mailto:Douglas.Pomeroy@faa.gov]  
Sent: Thursday, January 12, 2012 1:51 PM

To: Koop, Kenneth M LTC NGCA  
Subject: e-mail confirming that the California Air National Guard has no comments on the Gross Field Airport Runway Extension Draft EIS/EIR

Lt. Col Kenneth Koop  
California Air National Guard  
916-369-4331

Hi Lt Col. Koop,

Thank you for your telephone message today advising me that the California Air National Guard has no comments on the Draft Environmental Impact Statement/Environmental Impact Report, Gross Field Airport, Proposed Extension of Runway 13/31.

I would appreciate a return e-mail confirming your telephone message. Thank you for taking the time to review the documents.

Doug Pomeroy  
Environmental Protection Specialist

NEW ADDRESS and TELEPHONE  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835  
Telephone 650 - 827 - 7612; FAX 650 - 872 - 1430



## County of Marin

COUNTY OF MARIN  
COMMUNITY DEVELOPMENT AGENCY

MARIN



Environmental Health Services  
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San Rafael, CA 94903  
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February 6, 2012

Via U.S. Mail and Fax: (650) 872-1430

Mr. Doug Pomeroy  
U.S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Blvd., Suite 220  
Brisbane, CA 94005-1835

RE: Comments on GROSS Field Draft EIS, EIR

Dear Mr. Pomeroy:

Marin County Environmental Health Services, the solid waste Local Enforcement Agency, has reviewed the Draft Environmental Impact Statement/Environmental Impact Report for the proposed extension of Runway 13/31 at Gross Field Airport. We have comments and corrections that would improve the accuracy of the document. These comments and corrections follow.

More importantly, it is noted that no mitigation for impacts of increased bird strikes are included.

Redwood Landfill (RLI) has operated in its location since 1958. Due to its operation and its proximity to an adjacent airport (i.e. Gross Field), RLI is required to take measures to minimize the bird population. Since Gross Field is proposing the runway extension that would bring it closer to RLI's southern property line and operations, which would result in aircraft flying at lower elevations, it is unreasonable to expect RLI to bear all responsibility for the mitigation of increased bird strikes. Mitigation measures to be taken by Gross Field should be included in the EIS/EIR.

Environmental Impact Statement

[1] Page 4-25, first paragraph, third sentence: "Marin County has aviation easements on some properties to the north and south of the Airport to prevent the construction of structures that would inhibit the takeoff and landing of aircraft at the Airport. Should be navigation."

2 | Page

17.1

[2] Page 4-25, second paragraph, first sentence: "Redwood Landfill, a 450-acre site owned by Waste Management, is located approximately one-half mile northwest of DVO, directly east of Highway 101. RLI is a 420-acre site."

17.2

[3] Page 5.1.7-14, last paragraph, second to last sentence: "Marin County contracts with Waste Management Incorporated (WMI) for solid waste collection and diversion." It is presumed that this reference pertains to solid waste collection and diversion at DVO, specifically. Solid waste collection at DVO is provided by Novato Disposal, not WMI. In fact, WMI no longer provides collection service anywhere in Marin County.

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[4] Page 5.1.7-15, first paragraph, second sentence: "The RLI is a 450-acre site owned by WMI and located at 8950 Redwood Highway. Please refer to comment 2).

17.3

[5] Page 5.1.7-15, first paragraph, sixth sentence: "The current permitted maximum height for the landfill is 160 feet, which nearly doubles its current capacity." The permitted maximum height for the landfill is 122 feet at the north peak, and 166 feet at the south peak. The most recent aerial survey of the landfill was conducted on April 22, 2011. At that time, there were an estimated 18,288,000 tons of material (waste and cover) in place. The permitted maximum capacity of the landfill is 26,077,000 tons, inclusive of waste and cover. The remaining capacity does not, therefore, even come close to being double the current capacity.

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[6] Page 6-4, third paragraph, first sentence: "The Redwood Landfill (RLI) is located approximately 1.5 miles north/northwest of DVO along Highway 101." RLI is located approximately 3,000 feet north/northwest of DVO along Highway 101.

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[7] Page 6-4, first paragraph, second sentence: "This project would include the following activities." The referenced project was approved when RLI's Solid Waste Facility Permit was revised in December 2008 and is currently being implemented.

Environmental Impact Report

5.4

[1] Page 2-23, Table 2-2, Environmental Impact 4.2-4, third Mitigation Measure: "If bird activity at the landfill, including areas outside the permitted landfill footprint proposed for composting, increases as a result of the project, as determined by the Law Enforcement Agency....." This is a reference to Marin County Environmental Health Services, the solid waste Local Enforcement Agency.

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[2] Page 4.2-4, Existing Land Uses, fourth paragraph: "Redwood Landfill, a 450-acre site owned by Waste Management, Incorporated is located approximately one-half mile northwest of DVO, directly east of Highway 101." RLI is 420 acres.



17.4 3) Page 4.2-11, second paragraph, first sentence: "The Redwood Landfill is located approximately 1.5 miles north/northwest of DVO along Highway 101." RLI's southern boundary is located approximately 3,000 feet north of DVO.

17.5 4) Page 4.2-11, second paragraph, second sentence: "This project would include the following activities." The referenced project was approved when RLI's Solid Waste Facility Permit was revised in December 2008, and is currently being implemented.

17.3 5) Page 4.2-11, main paragraph, fifth sentence: "The current operating elevation at the RLI landfill is approximately 86-88 feet, with permitted maximum landfill height at 160 feet." The permitted maximum height of the landfill is 122 feet at the north peak, and 166 feet at the south peak.

17.6 6) Page 4.2-12, third paragraph, second sentence: "As owner and operator of the DVO, Marin County also has the authority to direct the landfill to undertake additional management measures if the existing measures at the landfill prove insufficient in preventing the area from becoming an attractant to birds." In 1992, Marin County Environmental Health Services was designated by the CA Integrated Waste Management Board (CIWMB) as the solid waste local enforcement agency (LEA). Although it is an administrative department within the Marin County Government, the LEA is governed by the state agency charged by the legislature to carry out the Integrated Waste Management Act, the Department of Resources, Recycling and Recovery (CalRecycle), formerly the CIWMB. The LEA, which permits and inspects RLI, serves as the designated representative of CalRecycle, not the County of Marin. The County of Marin does not have the authority over solid waste facility permit conditions and/or solid waste management.

17.7 7) Page 4.2-12, fourth paragraph: "RLI operates under the Solid Waste Facilities Permit #21-AA-0001, issued by Marin County on December 8, 2008, with concurrence by the State Integrated Waste Management Board. This permit speaks to the size of the working face and addresses the measures the landfill must implement in order to control birds attracted to the face." The Solid Waste Facilities Permit was issued by the LEA, not Marin County, on December 18, 2008. The permit does not directly address the size of the working face. RLI's Joint Technical Document, which describes operating practices at the facility, states that minimizing the size of the working face is one of the operational controls in RLI's vector and bird control management plan. The references to bird control measures are contained in Mitigation Measures 3.6.2a and 3.6.2.d of the November 17, 2008 Mitigation Monitoring and Report Program, which is incorporated into the Solid Waste Facilities Permit as LEA Condition D.

17.8 8) Page 4.2-12, fifth paragraph, first sentence: "As part of the application for a new Solid Waste Facilities Permit, RLI underwent extensive environmental review including the preparation of a full scope Environmental Impact Report (EIR), which was certified by Marin County on December 18, 2008 before issuing the Solid Waste Facilities Permit." RLI applied for a revised Solid Waste Facilities Permit, not a new permit. The EIR was certified on June 10, 2008 by the LEA, not Marin County.

9) Page 4.2-13, third paragraph, second, third and fourth sentences: "Given that the area of the working face of the landfill would be larger as a result of the RLI expansion project, it could result in increased bird activity at RLI and an associated risk of bird/aircraft strikes. The proposed increase in composting operations, especially the addition of food as a composting feedstock, also could increase bird activity at the RLI site and contribute to increased risk of bird/aircraft strikes. In addition, the increased amount of light that would be needed to accommodate the larger working face could potentially interfere with nighttime aircraft operations at DVO." The Mitigated Alternative that was approved by the LEA when RLI's Solid Waste Facilities Permit was revised did not include a lateral expansion of the landfill, or an increase in daily waste receipts. Consequently, there is no reason to assume that the working face will be larger. Under the Mitigated Alternative, food waste was approved as a feedstock for the composting operation, but the volume of material accepted for composting did not increase.

10) Page 4.4-19, last paragraph: "This project has the potential to impact ground water quality. The impacts, can, however, be mitigated to less-than-significant by utilizing a continuous landfill gas monitoring and alarm system at designated areas, revising the landfill's water quality monitoring and gas control monitoring programs as necessary, and preparing a final Closure and Post-Closure Maintenance Plan that demonstrates that waste would remain isolated and prevent groundwater degradation." LEA staff has never heard of a continuous landfill gas monitoring and alarm system being utilized to protect ground water quality. When provided at landfills, including closed disposal sites, they are used to detect the accumulation of landfill gas in occupied structures, such as offices.

11) Page 4.13-3, last paragraph, second sentence: "Marin County contracts with Waste Management Incorporated (WMI) for solid waste collection and diversion." Marin County contracts with Novato Disposal (North Bay Corporation) for solid waste collection and diversion at DVO.

12) Page 4.13-4, first paragraph, second sentence: "The RLI is a 450-acre property owned by WMI and located at 8950 Redwood Highway." The RLI is a 420-acre property.

13) Page 4.13-4, first paragraph, fifth sentence: "The currently permitted maximum height for the landfill is 160 feet, which nearly doubles its current capacity." The maximum permitted height is 122 feet at the north peak, and 166 feet at the south peak. The most recent aerial survey of the landfill was conducted on April 22, 2011. At that time, there were an estimated 18,288,000 tons of material (waste and cover) in place. The permitted maximum capacity is 26,077,000 tons, inclusive of waste and cover, including final cover. The remaining capacity does not, therefore, even approach being double the current capacity.

14) Page 4.16-4, first paragraph, first sentence: "As previously discussed in Section 4.2, Land Use and Planning, the Redwood Landfill and Recycling Center (RLI), a 450-acre site owned by



17.1 Waste Management, is located approximately one-half mile northwest of DVO, directly east of U.S. Highway 101." Please refer to comment 11).

17.9 15) Page 4.16-11, last highlighted sentence: "A propane gas-fired cannon may be used in conjunction with the pyrotechnic devices. The cannon emits a loud blast that discourages gulls from approaching the active face of the landfill." The propane gas-fired cannon is no longer being used at RL.

17.6 16) Page 4.16-11, third paragraph: "RL is adaptive bird management plan is required by Marin County, California, through its permitting authority over the RL. As owner and operator of DVO, Marin County also has the authority to direct the landfill to undertake additional management measures if the existing measures at the landfill prove insufficient in preventing the area from becoming an attractant to birds." Please refer to comment 6).

17.7 17) Page 4.16-11, fourth paragraph: "RL operates under the Solid Waste Facilities Permit #21-AA-0001, issued by Marin County on December 8, 2008, with concurrence by the State of California Integrated Waste Management Board. This permit speaks to the size of the working face and addresses measures the landfill must implement in order to control birds attracted to the face." Please refer to comment 7).

17.8 18) Page 4.16-11, fifth paragraph: "As part of the application for a new Solid Waste Facilities Permit, RL underwent extensive environmental review including the preparation of a full scope EIR, which was certified by Marin County on December 18, 2008 before issuing the Solid Waste Facilities Permit." Please refer to comment 8).

LEA staff appreciates the opportunity to comment on the Draft SIS/EIR. If you have any questions or require additional information, do not hesitate to contact the undersigned at (415) 473-6790.

Sincerely,



Mark Janofsky, R.E.H.S.

cc: Rebecca Ng, Deputy Director, Community Development Agency

Michael Frost, Deputy Director, Department of Public Works

Osha Meserve, Soluri Meserve

Jessica Jones, District Manager, Redwood Landfill

P:\STATE\MARK\REFPROJ\Comments on Draft SIS EIR.docx





1010 F Street, Suite 100 Sacramento, CA 95814  
Tel: 916.455.7300 Fax: 916.244.7200

February 6, 2012

LA U.S. Mail and Facsimile: (650)872-1430

Mr. Doug Pomeroy  
FAA San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835

RE: Comments on DEIR DEIS for Gross Field Airport's  
Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:

This letter is written on behalf of the Redwood Landfill and Recycling Center ("Redwood") regarding the Draft Environmental Impact Report ("DEIR") and Draft Environmental Impact Statement ("DEIS") for the Marin County Airport Gross Field Proposed Extension of Runway 13/31 ("Runway Extension project").

#### Background

On August 29, 2008, Redwood provided comments on the Notice of Preparation ("NOP") for the DEIR/DEIS. In those comments, Redwood provided notification that the EIR for revisions to Redwood's Solid Waste Facility ("SWF") permit had been certified in June 2008 and that issuance of a SWF permit consistent with the project alternative referred to as the Mitigated Alternative was expected in December 2008. The letter also requested that:

the environmental review document for the Runway Extension project carefully analyze compatibility Redwood's existing operations. While Redwood currently undertakes an effective Bird Control Program, changes in operation at Gross Field (such as changes in flight patterns) could create safety and other concerns that may not be adequately addressed by Redwood's current Bird Control Program. Should the Runway Extension project result in the need for any additional bird control measures, Gross Field must take full responsibility for ensuring that such additional measures are implemented.

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As anticipated, a revised SWF permit consistent with the Mitigated Alternative was issued by the Local Enforcement Agency ("LEA") for Marin County on December 18, 2008. (See Exhibit A.) The Mitigation Measures 3.6.2a-d, which were provided as an attachment to the NOP comment letter, were also adopted at the time of the SWF permit issuance. (See Exhibit B.)

While the current DEIR/DEIS does discuss potential for land use incompatibilities with Redwood's operations, the DEIR/DEIS contains several inaccuracies regarding Redwood's current operations under the 2008 revised SWF permit and fails to provide adequate mitigation for impacts caused by the runway expansion project. These comments clarify Redwood's permitted operations and provide information necessary to correct the DEIR/DEIS so that it may accurately discuss this potential land use compatibility impact.

#### Environmental Setting and Responsibility for Mitigation

Redwood's operations under the 2008 SWF permit are part of the environmental baseline against which the impacts of the runway expansion project must be measured. Under CEQA Guidelines section 15125, subdivision (a), the environmental baseline is normally those conditions that existed at the time the NOP is published. "In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the [NOP] is published. (CEQA Guidelines, 15126.2, subd. (a).)

Here, the revised SWF permit has been in place for nearly three years by the time the DEIR/DEIS was released for public review in December 2011. The existing permitted conditions at Redwood are therefore the appropriate baseline against which the effects of the runway project should be analyzed. The proposed project would result in the north end of the runway being located 1,100 feet closer, making the runway 2,500 feet from the southern edge of the Redwood. Aircraft would also fly about 25-50 feet lower over Redwood than existing conditions. (DEIR, p. 4-2-14.) To the extent these changes result in additional bird strikes or other related hazards, those impacts are caused by the runway expansion, not Redwood's operations under the 2008 SWF permit. As a result, the responsibility for mitigation of any increased risk of gull strikes rests with the airport expansion project, not Redwood. (See CEQA Guidelines, 15126.4, subd. (a).)

The DEIR/DEIS notes that Redwood's SWF permit "requires mitigation measures including ongoing management efforts to prevent minimize bird attractants. If deemed ineffective over time, the mitigation measures will change per Marin County's [sic] permit requirements." (DEIR, p. 4-2-14.) With respect to cumulative impacts, the DEIR concludes that "mitigation included in the Redwood Landfill EIR ensures that no land use

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5.2

conflicts between the RLJ and DVO will occur." (DEIR, p. 4.2-17.) This approach is incorrect, as the existing setting includes Redwood's current operations. Moreover, the DEIR DEIS places the burden of impacts caused by the airport's Runway Extension project on Redwood rather than requiring mitigation to be carried out by the project currently under review (the Runway Extension project).

As required by Mitigation Measures 3.6.2a-d and as also described in Redwood's Joint Technical Document, Redwood certainly intends to continue its bird control program. Redwood also understands and appreciates the utility of the Runway Extension project for the County. But Redwood cannot take on additional bird control costs that would not occur but for the airport Runway Extension project. Redwood therefore suggests the addition of a mitigation measure for the project as follows:

5.9

Should the LEA determine that additional bird control measures are necessary to ensure the safety of the airport operations in the future, the airport shall take responsibility for the cost of such additional bird control measures.

Such a mitigation measure would ensure that Redwood is not unfairly burdened with the responsibility to undertake additional bird control measures as a result of the Runway Extension project.

#### Clarifications to Analysis in Text

Redwood suggests that the following clarifications and corrections be made in the Final EIR/EIS:

#### Description of Redwood's Operations

The description of Redwood's operations should track the 2008 SWF permit. (See Exhibit A.) The operations described on page 4.2-11 of the DEIR DEIS is written as though the SWF permit for the Mitigated Alternative has not yet been approved. Moreover, it is only necessary to discuss those aspects of the 2008 SWF permit that relate to the impact being analyzed – land use inconsistencies from extending the runway closer to Redwood.

17.5

#### The LEA is the Permitting Entity for Purposes of the Details of Redwood's Operations

The DEIR DEIS repeatedly refers to the "County" with respect to the permitting of Redwood. (DEIR, pp. 4.2-11 to 4.2-14.) While the County did issue a Conditional Use Permit to Redwood in 1958, the details of Redwood's operations are governed by a

17.7

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17.7

SWF permit, as discussed above. The Marin County Environmental Health Services, a division of the Marin County Community Development Department, was designated as the LEA in 1992. With oversight by the California Department of Recycling and Resource Recovery ("CalRecycle") the LEA has sole SWF permitting authority over Redwood. Thus, the references to "Marin County" with respect to the permitting of Redwood's operations should be changed to "the LEA."

#### The 2008 SWF Permit Revision did not Increase the Potential for Bird Sinkers or Interference with Aircraft Operations


The discussion in the DEIR erroneously refers to a lateral expansion, an increase in the working face of the landfill, an increase in composting operations and increased nighttime activity. (DEIR, p. 4.2-13.) None of these activities were permitted in the 2008 SWF permit. Some of these activities, however, were analyzed in Redwood's EIR as part of the proposed project, which was ultimately not approved by the LEA in favor of the Mitigated Alternative. This discussion should be corrected to reflect currently permitted operations.

\*\*\*

Thank you for considering these comments. Please contact me or Jessica Jones, Redwood's District Manager (415) 408-9054, should you have any questions or require any assistance in ensuring that the Final EIR/EIS accurately addresses the land use compatibility concerns raised by the Runway Extension project.

Very truly yours,

**SOLURI MESERVE**  
A Law Corporation

By:   
Osha R. Meserve

#### Attachments:

Exhibit A: SWF Permit  
Exhibit B: Mitigation Measures 3.6.2a-d

cc: Rebecca Ng, Marin County Supervising Environmental Health Specialist



## EXHIBIT A

SOLID WASTE FACILITY PERMIT		Facility Number: 21-AA-0001	
1. Name & Street Address of Facility Redwood Landfill 8950 Redwood Highway Novato, CA 94945	2. Name & Mailing Address of Operator Redwood Landfill, Inc. P.O. Box 793 Novato, CA 94948	3. Name & Mailing Address of Owner Redwood Landfill, Inc. P.O. Box 793 Novato, CA 94948	
4. Specifications: a. Permitted Operations: <input checked="" type="checkbox"/> Solid Waste Disposal Site <input checked="" type="checkbox"/> Composable Material Handling Facility			
b. Permitted Hours of Operation: Public: M - F, 7:00 am - 3:00 pm and Sat, 8:00 am - 3:00 pm Commercial Haulers: M - F, 12:00 am - 3:00 pm and Sat, 12:00 am - 3:00 pm (except Sludge Haulers) Memorial Day, July 4, Labor Day, Thanksgiving Day except Sun, 12 am - 12 pm Closed to public and commercial haulers: Sundays, New Year's Day, Christmas Day Sludge Haulers: M - Sun, 24 hours per day except New Year's Day and Christmas Day Landfill Operations: 24 hours per day except New Year's Day and Christmas Day			
Permitted Maximum Tonnage: <b>2,310 tpd</b> Total Material Permitted to be Received per Day - See 16.K. and 16.L.			
c. Permitted Traffic Volume: 962 Total Daily Vehicles Entering Site of which 50 Vehicles are Employees, Visitors, Deliveries			
d. Key Design Parameters (Detailed parameters are shown on site plan bearing EA and CIWMB validation):			
Permitted Area (in Acres)	Total	Disposal	Transformation
Total Capacity (w/ cover & cap)	420	222.5	7
Maximum Elevation (Ft. MSL)		26,077,000 cy	60,000 cy
Maximum Depth (Ft. BGS)		122' North Peak 166' South Peak	
Estimated Closure Date		20'	
Upon a significant change in design or operation from that described herein, this permit is subject to revocation or suspension. The attached permit findings and conditions are integral parts of this permit and supersede the conditions of any previously issued solid waste facility permit.			
5. Approval:  Philip D. Smith, Local Enforcement Agency		6. Enforcement Agency Name and Address: Marin County Environmental Health Services 3501 Civic Center Drive, Room 236 San Rafael, CA 94903	
7. Received by CIWMB: November 18, 2008		8. CIWMB Concurrence Date: DEC 16 2008	
9. Permit Review Due Date: December 18, 2013		10. Permit Issued Date: December 18, 2008	



## SOLID WASTE FACILITY PERMIT

Facility Number:

21-AA-0001

### 11. Legal Description: APN 125-16-13

Section 30 T-1N R6W double Meridian - PARCEL ONE, as shown upon that certain parcel map entitled "Parcel Map of Redwood Landfill", filed for record August 25, 2003 in Volume 2003 of Maps, at page 197, Marin County Records, EXCEPTING any portion of the described property within the natural bed of San Antonio Creek and in the natural bed of any tidal slough below the elevation of ordinary high tide where it was located prior to any artificial changes.

The legal description of this facility is contained on page 2-1 of the Joint Technical Document Report of Disposal Site Information dated August 2008.

### 12. Findings

- This permit is consistent with the Marin County Integrated Waste Management Plan, which was approved by the CWMH in April 1998.
- This permit is consistent with standards adopted by the California Integrated Waste Management Board (CIWMB) pursuant to Public Resources Code, Section 44010.
- The design and operation of the facility is consistent with the State Minimum Standards for Solid Waste Handling and Disposal as determined by the enforcement agency pursuant to Public Resources Code, Section 44009.
- The Novato Fire Protection District has determined that the facility is in conformance with applicable fire standards pursuant to Public Resources Code, Section 44151.
- A Final Environmental Impact Report was filed with the State Clearinghouse (SCH #199/031042) and certified by the Marin County Environmental Health Services on June 10, 2008. The Redwood Landfill 1999 Revised Solid Waste Facility Permit Final EIR describes and supports the design and operation, which will be authorized by the issuance of this permit.
- The owner/operator has agreed to comply with the mitigation measures as described in the Mitigation Monitoring and Report Program dated November 17, 2008. The LEA will monitor compliance with the Mitigation Monitoring and Report Program and take appropriate action on subjects within its jurisdiction. The LEA will also consult with other responsible agencies designated in the MMRP as needed on enforcement issues outside of its jurisdiction.

### 13. Prohibitions:

The permittee is prohibited from accepting the following wastes:

Hazardous, radioactive, medical (as defined in Chapter 6.1, Division 20 of the Health and Safety Code), treated solid (as defined in Chapter 6.5, Division 20 of the Health and Safety Code), high liquid content waste, degummed, or other wastes requiring special treatment on handling, except as noted below as identified in the Joint Technical Document/Report of Disposal Site Information and approved amendments thereto and as approved by the enforcement agency and other federal, state and local agencies.

The permittee may accept the following non-hazardous wastes with high liquid content that meet waste acceptance criteria in the RWQCB Waste Discharge Requirements:

- Dewatered sludge (containing at least 20 percent solids by weight);
- Grit and grease from municipal wastewater treatment plants;
- Holding tank pumpings from food processing facilities;
- Sewer drain cleanings;
- Dedged wellwaters.

The permittee may accept the following wastes (that require special handling):

- Minimally petroleum-contaminated non-hazardous and (as defined by the Regional Water Quality Control Board);
- Non-flammable asbestos containing less than one percent (1%) friable asbestos content.

## SOLID WASTE FACILITY PERMIT

Facility Number:

21-AA-0001

### 14. The following documents describe the and/or restrict the operation of this facility:

Document	Date	Document	Date
Complete SWP Application	Oct 23, 2008	CIEQA Findings	Nov 17, 2008
STD Report of Disposal Site Information as Amended	Aug 2008	Mitigation Monitoring and Report Program	Nov 17, 2008
Waste Discharge Requirements Order No. 95-110	May 24, 1995	Preliminary Closure & Postclosure Maintenance Plan	Sept 2008
Conditional Use Permit	March 1958	Closure Financial Assurance Documentation	Oct 2008
Final Environmental Impact Report (SCH #199/031042)	June 10, 2008	Operating Liability Certification	Dec 13, 2007
Marin County Haz Waste & Haz Materials Mgmt Permit #60-0155	Dec 28, 2007	Amy Corp of Engineers Nationwide Permit	Jan 6, 1995
BAAQMD Major Facility Review Permit, Facility #A1179	Oct 24, 2007	BAAQMD Permit to Operate #25812 (Compost)	Feb 27, 1997
Report of Composting Site Information	Aug 11, 2008	SWRCB Industrial Activities Storm Water General Permit	May 1, 1997

### 15. Self-Monitoring:

The owner/operator shall submit the results of all self-monitoring program to the Local Enforcement Agency (LEA) within 30 days of the end of the reporting period (for example, 1<sup>st</sup> quarter = January - March, the report is due by April 10, etc. Information required on an annual basis shall be submitted with the 4<sup>th</sup> quarter monitoring report, unless otherwise stated.)

Where noted, the results need not be sent to the LEA. They shall be retained on the facility's premises for a minimum of three (3) years and made available for review upon request.

Program	Reporting Frequency
A. The areas of the site that were used for disposal.	Quarterly
B. The types and quantities of waste received each day (in tons) and separated and recycled or reused material (in tons).	Quarterly
C. The number of vehicles utilizing the facility per day of operation separated by waste type and other.	Quarterly
D. Logs and reports of all complaints regarding the facility and the operator's action(s) taken in response to the complaints.	Quarterly
E. Logs and reports of all shutdowns other than the closed days specified in this permit. (See condition 16.1.)	As Required
F. Logs of special or unusual occurrences and the operator's action(s) taken to correct/resolve the problem/situation. (See condition 16.1.)	As Required
G. The quantities and types of prohibited wastes (hazardous, medical, etc) found in the waste stream and the disposition of these materials.	Available Upon Request
H. Records of the random load checks conducted pursuant to condition 16.1.	Available Upon Request



15. Self-Monitoring (continued)	Reporting Frequency
I. An employee training log with dates, of training, course descriptions, etc. shall be maintained and kept current.	Available Upon Request
J. Records of the pumping of the on-site septic holding tanks.	Available Upon Request
K. The amounts of leachate applied for dust control.	Available Upon Request
L. Records of quantities and length of time materials for alternative daily cover, recycling, composting, and construction material, are stored on-site before used or removed.	Available Upon Request
M. Records of temperature readings and window turning.	Quarterly
N. Results of the laboratory testing for pathogen and metal concentrations per T14, sections 17868.2 and 17868.3.	Quarterly
O. Records of quantities of compost disposed at the site or another site and the reason it was disposed.	Available Upon Request
P. The types and quantities of residuals resulting from the on-site processing of recyclable material and food waste that are landfilled.	Quarterly
Q. The results of the landfill decomposition gas monitoring program.	Quarterly
R. A summary of the monitoring data submitted to the Regional Water Quality Control Board.	Semi-annually
S. An annual report indicating the amounts of tons and cubic yards of solid waste disposal capacity including cover material that was used during the preceding calendar year, and the number of cubic yards of remaining disposal capacity and map showing the areas with remaining capacity.	Annually
T. An annual monitor (or audit) report by the independent third party monitor. (See condition 16.T.)	Annually

## SOLID WASTE FACILITY PERMIT

Facility Number:

21-AA-0001

### 16. LEA Conditions:

- This permit supersedes previous solid waste facility permits, Nos. 21-AA-0001 and 21-AA-00056.
- This facility shall comply with all applicable State Minimum Standards for Solid Waste Handling and Disposal as specified in the California Code of Regulations (CCR), Title 27. The operator shall inspect the site at least once each day of operation for compliance with all applicable standards.
- This facility shall comply with all applicable State Compostable Materials Handling Operations and Facilities Regulatory Requirements as specified in the California Code of Regulations (CCR), Title 14. The operator shall inspect the site at least once each day of operation for compliance with all applicable standards.
- The owner/operator shall comply with all Mitigation Measures/Conditions of Approval contained in the Mitigation Monitoring and Report Program (MMRP) adopted by the LEA acting as the lead agency for CEQA. The operator may propose minor modifications to the Mitigation Measures/Conditions of Approval contained in the MMRP as allowed in Title 27, C.C.R. Article 3 (CIWMH-Enforcement Agency Requirements), including but not limited to Section 21665 (Processing Proposed Changes at Solid Waste Facility), and subject to the limitations contained in the California Environmental Quality Act (CEQA) with respect to changes that would necessitate supplemental environmental review [Pub. Resources Code, Section 21166, Title 14 C.C.R., Section 14000 et seq. (CEQA Guidelines), Sections 15162, 15163, 15164].
- The operator shall comply with all enforcement orders issued by any responsible agency contained in any of the documents referenced within this permit pursuant to Public Resources Code 21081.6.
- The operator shall maintain copies of the inspection reports and permits issued by the LEA and other regulatory agencies. The operator shall maintain copies of the Solid Waste Facilities Permit (SWFP), the Mitigation Monitoring and Report Program (MMRP), the JTD/Report of Disposal Site Information (RDSI), the Report of Composting Site Information (RCSI), and the Odor Impact Minimization Plan (OIMP) at the facility so as to be available at all times to facility personnel, LEA personnel, and other regulatory agencies.
- Additional information regarding the facility shall be furnished upon request and within the time frame specified by the LEA.
- During the hours of operation for all landfill activities and composting activities, an attendant or attendants shall be present at all times to supervise the loading and unloading of the waste material.
- The operator shall notify the LEA at least 48 hours prior to scheduled shutdowns and within one hour of unscheduled shutdowns. A log of these shutdowns shall be maintained and available at all times.
- The operator shall maintain a log of special/unusual occurrences. This log shall include, but it not limited to, fires, explosions, the discharge and disposition of hazardous or unpermitted wastes, and significant injuries, accidents or property damage. Each log entry shall be accompanied by a summary of any actions taken by the operator to mitigate the occurrence. The log shall be available to site personnel and the LEA at all times.



K. The maximum permitted daily tonnage received at the facility is **2,310 tons per day**. The tonnage of concrete, asphalt, and minimally petroleum-contaminated materials used for construction and cover will not count towards the maximum daily tonnage limit. This facility shall not receive more than this amount and shall be limited to the amounts and categories as shown on page 1. Any changes to the amounts and categories shall require a revision to this permit.

L. The maximum permitted daily tonnage received at the facility for combustible materials is restricted to **170 tons per day**. The compost operation is restricted to 60,000 cubic yards of feedstock, active compost, and finished product on site at any time. Feedstock is limited to Class B broodstock, food waste, and green/yard/wood waste.

M. This permit is subject to review by the LEA and may be suspended, revoked, or revised at any time for sufficient cause.

N. The LEA reserves the right to suspend or modify waste receiving, disposal, and handling and/or composting activities when deemed necessary due to an emergency, a potential health hazard, or the creation of a public nuisance.

O. Any change that would cause the design or operation of the facility not to conform to the terms and conditions of this permit is prohibited. Such a change may be considered a change requiring a permit modification or revision. In no case shall the operator implement any change without first submitting a written notice of the proposed change, in the form of a JTD/RDSI amendment or an RCSI amendment application, to the LEA at least 180 days in advance of the plan to implement change.

P. The operator shall maintain the LEA-approved hazardous/prohibited waste screening/exclusion program at the facility. On-site load checking shall include: inspection of random loads; regular visual inspection of wastes deposited at the facility; training of facility personnel in hazardous and prohibited waste recognition and proper hazardous waste handling procedures; recordkeeping of hazardous and prohibited wastes found. Inspection of random loads by trained personnel shall be conducted on commercial and public loads, a minimum of two loads on two days per week. A record shall be maintained on each random load check with the name of the staff conducting the check, date, time, vehicle owner/operator, license plate number or VIN number, any prohibited waste found, and disposition of the prohibited waste.

Q. The operator shall comply with requirements of applicable laws pertaining to employee health and safety, including maintaining a current Cal OSHA Injury and Illness Prevention Program on-site readily available for review by employees, the LEA and other regulatory agencies.

R. An aerial survey of the landfill shall be conducted once per calendar year. A report shall be written on the findings of the survey and submitted to the LEA once a year no later than 45 days from the survey date. The findings shall include: the volume and tons of all material in place; the volume and tons of all material placed since the last survey; the remaining capacity in volume and tons available at the landfill.

S. An independent third party shall be retained at the facility's expense to monitor the facility's compliance with all conditions of this Solid Waste Facility Permit, including the Mitigation Monitoring and Reporting Program (MMRP) adopted by the LEA as the lead agency for CEQA. The independent third party retained shall be subject to approval by the LEA. At a minimum, the first complete monitoring (or audit) report shall be made available to the LEA within one year of final

## SOLID WASTE FACILITY PERMIT

Facility Number:

21-AA-0001

### 16. LEA Conditions (continued):

SWF permit issuance, subject to reasonable extension by the LEA based on a showing of good cause. Thereafter, monitoring (or audit) reports shall be submitted to the LEA on an annual basis. After the facility has complied with this condition for three years, the LEA shall have the discretion, within its authority to protect public health safety and the environment, to eliminate, extend, or otherwise modify this requirement in consideration of the utility of the information generated to the LEA and to the community, the expense to the facility of generating the information, and such other concerns as the LEA may deem relevant.

T. In accordance with the adopted Marin County Greenhouse Gas Reduction Plan (2006) and Marin Countywide Plan Update (2007) goals and policies, additional landfill capacity beyond the 1995 permitted capacity (to the total capacity of 26.1 mil cy) may be utilized when annual greenhouse gas emissions are reduced consistent with the 2011 benchmark contained in Mitigation Measure 3.2.5.f in the adopted MMRP. The owner/operator shall notify the LEA when the benchmark is met. Such notice shall be provided at least three (3) months prior to utilization of the additional landfill capacity.

U. The operator shall apply for additional permits needed to construct and implement a construction and demolition material resource and recovery operation (C&D operation) within the landfill property within two years of issuance of the SWFP and make every effort to complete implementation within three (3) years of SWFP issuance. The C&D operation will be regulated under a separate permit. At the time a separate permit is issued for the C&D operation, the entitlement to receive 400 tons per day of recyclable materials described in this SWFP will terminate, and the maximum tonnage received under this SWFP will revert to 1,910 tons per day.

V. The Odor Impact Minimization Plan (OIMP) shall be reviewed annually by the operator to determine if revisions are necessary. If changes to the OIMP and any operations are proposed, the changes must be submitted to the LEA at least 90 days in advance of the change.

W. All laboratory analyses of finished compost product shall be performed by a California State-certified laboratory. The results of the analyses shall be provided by the lab to the operator before the material tested is removed from the site.

X. If nuisance conditions develop with the compostable materials, immediate measures shall be taken to mitigate the problem. Records of measures taken to deal with such conditions shall be available to the LEA. If abatement cannot be achieved within 24 hours, the material shall be landfilled. Records of such disposal shall be available to the LEA.

Y. Random load checks of feedstocks, additives, and amendments for contaminants shall be conducted daily. Contaminants shall be removed prior to incorporation in a windrow. Contaminants shall be disposed of within 24 hours.

Z. As specified in Title 14, CA Code of Regulations, Chapter 3.1, Article 7, Section 17868.1, no compost shall leave the premises without meeting the metal concentration limits specified in Section 17868.2 and the pathogen reduction requirements specified in Section 17868.3. Verification of the pathogen reduction requirements shall occur prior to when compost is removed from the site.



AA. Compost that contain metals or pathogens in amounts that exceed the maximum acceptable metal concentrations and/or maximum acceptable pathogen concentrations described in Title 14, CA Code of Regulations, Chapter 3.1, Article 7, shall be designated for disposal or additional processing until it meets acceptable levels.

# EXHIBIT B



**REDWOOD LANDFILL SOLID WASTE FACILITIES PERMIT REVISION  
MITIGATION MONITORING AND REPORT PROGRAM  
November 17, 2008**

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURE/CONDITION OF APPROVAL	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFIED BY AND DATE
3.6.2 (cont.)	3.6.2c: To ensure that nighttime activities do not interfere with operations at Gross Field, lights used during nighttime landfill operations will not be colored, will be shielded and directed downward to reduce glare, and will be placed in an irregular pattern in order not to appear to be a runway. The applicant shall notify the Gross Field Airport prior to any change in the way lighting is used for nighttime operations.	Applicant	The project applicant shall implement this measure upon issuance of the revised SWFP. The project applicant shall notify Gross Field of changes to lighting prior to implementation of such changes.	Marin County EHS, Marin County ALUC	Marin County EHS, periodic inspections, and Marin County ALUC following notification of plan to revise use of lighting
	3.6.2d: If bird activity at the landfill, including the areas outside the permitted landfill footprint proposed for composting, increases as a result of the project, as determined by the EIA during regular site inspections, RLI shall adjust its existing bird control program as necessary to ensure that the facility does not pose a bird hazard to aircraft. RLI shall modify as necessary the demonstration required in 40 CFR Part 258, §258.10 (a) and 27 CFR, (202706) that the landfill does not pose a bird hazard to aircraft.	Applicant	The project applicant shall implement this measure immediately upon notification of a determination by the EHS that such revision is necessary.	Marin County EHS, Marin County ALUC	Marin County EHS, Marin County ALUC, as needed

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**REDWOOD LANDFILL SOLID WASTE FACILITIES PERMIT REVISION  
MITIGATION MONITORING AND REPORT PROGRAM  
November 17, 2008**

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURE/CONDITION OF APPROVAL	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFIED BY AND DATE
3.5.10 (cont.)	3.5.10c: In conjunction with implementing Mitigation Measure 3.5.5a and 3.5.5b, above, water contacting ADC shall be considered, and managed as, contact water. Thus water contacting ADC shall be managed separately from non-contact water and retained on site.	Applicant	The project applicant shall implement this measure upon issuance of the revised SWFP.	Marin County EHS, RWQCB	Marin County EHS and RWQCB, continuing periodic inspections
<b>Land Use</b>					
3.6.2: Development of the proposed project could result in conflicts with operations at Gross Field (1.75)	3.6.2a: The applicant proposes to continue their existing bird control program. Redwood Landfill's bird control program focuses on gulls, the predominant avian scavengers at the site, and consists of using pyrotechnic devices to discourage gulls from landing or circling overhead during refuse placement and compaction. The devices provide noise (bang or whistle), a flash of light, smoke, and the sound of the propellant. RLI focuses its deterrent efforts when the birds first begin to arrive in the morning (shortly after dawn) and the morning hours, having found that this results in fewer gulls approaching the site during the rest of the day. RLI also may use a gas-fired cannon, which emits a loud blast, in conjunction with the pyrotechnic devices. Redwood Landfill periodically re-evaluates and revises bird control techniques as necessary.	Applicant	The project applicant shall continue to implement this measure, consistent with other applicable mitigation measures, upon issuance of the revised SWFP.	Marin County EHS	Marin County EHS, continuing periodic inspections
	3.6.2b: The applicant proposes no change in the number or type of lights used for nighttime operations. There are no records that indicate that the existing use of lights at the landfill poses a hazard to operations at Gross Field.	Applicant	The project applicant shall implement this measure, consistent with other applicable mitigation measures, upon issuance of the revised SWFP.	Marin County EHS, Marin County ALUC	Marin County CDA-Planning, EHS and ALUC, periodically by EHS

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# North Marin Water District



999 Rush Creek Place  
P.O. Box 146  
Novato, CA 94948  
**PHONE**  
415.897.4133  
**FAX**  
415.897.8043  
**EMAIL**  
info@nmwd.com  
**WEB**  
www.nmwd.com

December 6, 2011

600	601	602	610	611	612	613	614	615	616	620	621	622	623	624	625	626	627	628	629	630
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75 Rowland Way #200  
Novato, CA 94945-3232  
415/899-8000  
FAX 415/899-8213  
WWW.NOVATO.CA.GOV

Mayor  
Patricia Adams  
Mayor Pro Tem  
Yvonne Eklund  
Councilmembers  
Madeline Kellner  
Irene Lucero  
Isabelle MacLennan  
City Manager  
Michael S. Frank

February 6, 2012

Mr. Doug Pomeroy  
U.S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835

RE: Gross Field Airport Proposed Extension of Runway 13/31;  
Draft Environmental Impact Report (EIR) and Draft Environmental  
Impact Statement (EIS)

Dear Mr. Pomeroy,

Thank you for including the City of Novato in the environmental review process for the project referenced above. The City has the following comments that may pertain, as applicable, to both the EIR and the EIS:

#### NOISE

The measurements of noise levels for existing aviation near sensitive receptors are only minimally included for all hours of daylight. There are aircraft, particularly small jets that arrive/depart on occasion in the early mornings and late evenings on Saturday and Sunday. Even though these over or near flights may be within standardized noise limits, these "nuisance" noise events should be noted for existing aviation, as well as any expected increase in those incidents as a result of the proposed project.

Several of the exhibits within the noise impact sections identify "Noise Measurement Sites". The S12 site is identified as located at the "End of Topaz Drive". The S12 site is shown on the exhibits to be well west of the actual location it is supposed to represent. The location of S13 also should be checked as it appears well east of where it should be.

#### POPULATION TRENDS

The population projections for the City of Novato are shown in Table 4-5 of the EIS. The projection shows 66,400 residents by the year 2020 as reported in the 1996 Novato General Plan (nearly 16 years ago). The estimate is also shown for 2008 to be 52,737. Based on existing, proposed and recent past actual development activity in the City, it is extremely unlikely that the population of Novato will increase by 13,660 residents in the next eight years. Are these population projections being used to support the need for the project and the anticipated increase in aviation at the airport?

The City feels obligated to respond to the employment and populations estimates in Tables 5.4-1 and 5.4-2 of the EIS for two reasons:

City of Novato

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5.07	5.07
5.16	5.16
5.11	5.11
5.12	5.12
5.13	5.13
5.14	5.14
5.15	5.15
5.16	5.16
5.17	5.17
5.18	5.18
5.19	5.19
5.20	5.20
5.21	5.21
5.22	5.22
5.23	5.23
5.24	5.24
5.25	5.25
5.26	5.26
5.27	5.27
5.28	5.28
5.29	5.29
5.30	5.30

February 6, 2012  
Page 2

6.2

The annual growth rate of 2% per year seems optimistic as the City of Novato and the larger San Francisco region struggles to combat a stagnant housing and jobs climate. Housing and employment projections in the EIS to 2030 that illustrate a growing economy misstate the current economic reality. Please state the source for the annual growth so the City can review this information. For the reasons discussed above, we request that the housing and employment estimates be reduced to reflect the existing data projections for the EIS.

Secondly, the City of Novato has responded to the Association of Bay Area Governments (ABAG) regarding its proposed Initial Vision Scenario (IVS) and Alternative Vision Scenarios (AVS) as part of the One Bay Area plan, and planning process. This Sustainable Communities Strategy, which incorporates the IVS and AVS, implements Senate Bill 375, which seeks to reduce greenhouse gases through the coordination of land use and transportation efforts.

6.3

The City of Novato disagrees with the methodology, assumptions, and forecasts that have been prepared, and assigned to Novato as part of the SCS process for both housing and job projections. The City questions the assignment of up to 1600 new housing units (projected from 2010 to 2040) based upon the data forecasts of population and employment projections. Recently, a bio-engineering firm based in Novato, secured 90,000 square feet (with the option of renting an additional 40,000 sq) of office space in San Rafael. This is a loss of 350 jobs from the City of Novato to the City of San Rafael.

For these reasons discussed above, the City of Novato disagrees with the housing and employment projections in the EIS in table 5.4-1 and 5.4-2.

#### FORESEEABLE DEVELOPMENT PROJECTS

The City has received a letter from the applicants of the redevelopment of Fireman's Fund Campus/The Commons at Mount Burdell, that they are withdrawing the project applications. Because of the project withdrawal, we would assume that the projections and forecasts in the EIR/EIS will be reduced accordingly.

22.1

#### SAFETY

Impact 4.16-5 (EIR) discusses operation of the airport with regard to any safety hazard for people residing or working in the project area. The discussion notes that the project would not result in a safety hazard if the Airport Land Use Commission follows federal regulations. There is no information demonstrating past airplane mishaps in the area and the projected increase in those incidents, and the safety hazard that may result, due to the project.

19.2

As a general comment we noticed that on various vicinity map exhibits the actual location of Bugera Drive, which is between Atherton Avenue and the Valley Memorial Park, where it then changes name to Bahia Drive, is instead shown to run through the Valley Memorial Park property.

23.2

Thank you for your consideration of these comments. We look forward to working with the Federal Aviation Administration on this project. If you have any questions in this matter, please contact me at (415) 493-4711 or email at edum@novato.org.



February 6, 2012  
Page 3

Sincerely,



Elizabeth Dunn  
Acting Community Development Director  
Community Development Department  
City of Novato  
75 Rowland Way, Suite 110  
Novato, CA 94945-3232

Cc: Novato City Council  
Michael Frank, City Manager  
Sheri Hartz, City Clerk  
Jason Nutt, Public Works Director



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Mike Glase

7077784405

P.1

City of Petaluma



# CITY OF PETALUMA

POST OFFICE BOX 61  
PETALUMA, CA 94953-0061

David Glass  
Mayor

Chris Harrison  
Jessica Barrett  
Mike Harris  
Mike Healy  
Gabe Kearney  
William White  
(707) 778-4400

February 3, 2012

U.S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 200  
Brisbane, CA 94005-1835

RE: State Clearinghouse No. 2008072037

Dear Mr. Pomeroy:

[We have reviewed the Draft EIR for the Runway Extension at Gnos Field. The current GPS Runway 13 Approach for Gnos Airport passes over a portion of homes in Petaluma. Reviewing the Aircraft Operations Forecast for Gnos, has there been any consideration as to this increase in Aircraft noise these homes may experience?]

4.1

Sincerely,

*Robert Patterson*  
Robert Patterson  
Airport Manager

## Public Works

Administration  
11 English Street  
Petaluma, CA 94952

Phone (707) 778-4174  
Fax (707) 776-3862  
E-Mail: [publicworks@cityofpetaluma.ca.us](mailto:publicworks@cityofpetaluma.ca.us)

## Airport

601 Sky Ranch Drive  
Petaluma, CA 94954  
Phone (707) 778-4404  
Fax (707) 778-4480

## Maintenance & Operations

Corporation Yard  
840 Hopper St. E. 1st  
Petaluma, CA 94952  
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Fax (707) 778-4415

## Public & Landscape

Maintenance  
840 Hopper St. E. 1st  
Petaluma, CA 94952  
Phone (707) 778-4415  
Fax (707) 778-4415

## Transit

555 N. McDowell Blvd  
Petaluma, CA 94954  
Phone (707) 778-4415  
Fax (707) 778-4415





Mr. Doug Pomeroy  
U.S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

February 6, 2012

Re: Gross Field DEIS/DEIR, Marin County, California

Dear Mr. Pomeroy:

The Marin Conservation League has actively monitored major environmental issues in Marin for some 78 years and has reviewed the documents distributed to the public to evaluate the impacts of extending the existing runway at Gross Field by 1100 feet. We had submitted information to be covered in the EIR/EIS as part of the scoping process. We were disappointed that many of the issues we had requested are not covered in the reports.

Marin Conservation League (MCL) requested that the additional aircraft capable of using DVO with a longer runway be identified. The documents identify the current fleet based at DVO and claim it will be the future fleet after a longer runway is constructed. Letters from two current tenants state they will buy larger planes if the runway is extended. The threshold for including larger aircraft in the fleet is stated as whether 500 annual operations will occur. If a survey of current tenants was done and none was interested in larger aircraft, it was not stated. What is the largest airplane that can safely use a runway 4400 feet long and 75 feet wide?

MCL was disappointed that the EIS allows mitigation at 1:1 for the loss of wetlands, however the county standard is recognized as 2:1 in the EIR. We strongly support mitigation at least 2:1 and that all mitigation sites be located in Marin County. All the mitigation sites identified in the documents are in Sonoma County and as far away as Cullinan Ranch. Cullinan Ranch is a worthy project, but much too far away to be of any benefit for the creatures displaced by the fill for the runway extension and necessary levees.

The impact of sea level rise on the elevation planned for the runway or any subsequent adaptation that may be required was not discussed. A hundred-year flood incident had some discussion, but that is a different situation than the gradual, but persistent impact of sea level rise. What is the anticipated life span of the proposed runway. The appendix in paragraph 7.3.6 identifies sea level rise potential at 4 meters by 2100. The San Francisco Bay Conservation and Development Commission (BCDC) has done important research and analysis of sea level rise in this Bay region. Using the IPCC greenhouse gas emission scenarios, in 2010 the California Climate Action Team (CAT) developed sea level rise projections (relative to sea level in 2000) for the state that range from 10 to 17 inches by 2050, 17 to 32 inches by 2070, and 31 to 69 inches at the end of the century.



14.3

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9.4

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BCDC policies include: "Consider project alternatives that avoid significant new development in areas that cannot be adequately protected (planning, permitting, development, and building) from flooding, wildfire and erosion due to climate change. The most risk-averse approach for minimizing the adverse effects of sea level rise and storm activities is to carefully consider new development within areas vulnerable to inundation and erosion. State agencies should generally not plan, develop, or build any new significant structure in a place where that structure will require significant protection from sea level rise, storm surges, or coastal erosion during the expected life of the structure. However, vulnerable shoreline areas containing existing development that have regionally significant economic, cultural, or social value may have to be protected, and in-fill development in these areas may be accommodated. State agencies should incorporate this policy into their decisions and other levels of government are also encouraged to do so." The EIR/EIS inadequately addressed this important issue. DVO vulnerability to sea level rise must be more thoroughly mitigated.

Some public statements have been made that Gross runway will perform a significant role in providing rescue service in case of a severe earthquake. A soils study should be made to determine if a rising water table would lead to a runway surface that will not support aircraft wheel loads. Determine if special construction considerations are given for ground water at the current level, what are the impacts of the future ground water levels?

The noise studies were performed, but only for one hour periods in the neighborhoods impacted by the airport noise. At least one of the one hour studies showed a heavy incidence of fly overs although the noise levels did not exceed Novato General Plan acceptable levels. This does demonstrate that the flight paths developed to minimize impacts on the neighboring residential are not being respected. What mechanisms can be implemented to enforce adopted procedures?

Other issues we feel were not adequately addressed in the DEIS/DEIR include:

#### Hydrology and Water Quality

Exhibit A-4.1 in the DEIR and Figure B-2 in the Appendices shows the flow of existing runoff from Mt. Burdell, Highway 101 and the railroad. There are additional flows from Olompali that are not illustrated. There is no discussion about how these flows will be changed with the fill for the extension. Will new channels be created? Will there be room around the north end of the extended runway and safety area for a flow diversion? If all the flow is diverted south are the existing drainage channels adequate?

Is there any testing of the flow from DVO runoff before it flows into the Petaluma River? Is there any testing of the subsurface system that the aircraft wash off areas uses or maintenance required? Are the herbicide applications along the runway recorded with the county agricultural department to assure compliance with county standards? These basic questions should have been addressed.

Mitigation for the loss of wetlands should be done onsite, if possible. There is an opportunity for wetland and brackish marsh restoration at Black John Slough, just south of the airport. This site provides an excellent opportunity immediately adjacent to DVO to address the creatures displaced by the project. There are other opportunities in the Novato Creek Basin for brackish marsh restoration, as well as the Corte Madera marshes. Mitigation should be done in Marin County.



Noise and Safety

2.1

The noise projections for DVO are based on the current fleet of planes. The disclosure of additional classes of aircraft could change that projection. If larger planes are based at DVO whether they operate more than 500 times a year should not be a criterion for including their contribution to noise.

4.2

Current technology should enable the airport management to identify planes that do not comply with the adopted flight protocols that reduce noise impacts on nearby residential areas. Enforcement of the protocols is deemed to be unrelated to the airport operations. We disagree. Airport management should take a more active role in enforcement.

4.5

The noise impact on Olompali State Historic Park will be greater with the runway 1100 feet closer. Noise and safety issues at a public facility like Olompali should have been more carefully evaluated. Olompali is a serene park of tremendous historic significance. The public uses are 99% outside, so mitigating noise is not possible. An airplane from Gross crashed at Olompali about 1996, which was a rare, but real safety issue. Establishing some protocols to protect Olompali (and pilot safety) should be prioritized.

10.1

Although the presence of Highway 101 and the SMART/NCRA railroad tracks are acknowledged, there was no discussion of the safety impacts of moving the runway 1100 feet closer. Any miscalculation at takeoff or landing could impact thousands of people using those public facilities. The proximity of DVO to RLJ was thoroughly discussed. Are there any safety regulations by FAA about proximity to highways and railroad tracks? Can planes be required to initiate their take off as far south as possible when taking off to the northwest? This safety issue should have been addressed.

19.3

Thank you for the opportunity to comment on these documents. We look forward to receiving the Final EIR/EIS.

Yours truly,



Susan Stompe  
President





## Marin Audubon Soc.

P.O. BOX 599 | MILL VALLEY, CA 94041-0599 | MARINAUDUBON.ORG

February 6, 2012

Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airports District Offices  
1000 Marina Blvd., Suite 220  
Brisbane, CA 94005-1835

RE: DEIS/EIR FOR GROSS FIELD AIRPORT RUNWAY EXTENSION PROJECT

Dear Mr. Pomeroy:

The Marin Audubon Society appreciates the opportunity to comment on the Draft EIR and EIS for the Gross Field Expansion Project. The focus of our comments is on environmental impacts, to species and wetland resources in particular, in and near the project site.

How the final project will be chosen should be stated. Will the final project alternative comply with both federal and state requirements, policies, guidance etc, or will one jurisdiction's guidance take precedent over the other?

We have the following questions and comments on specific aspects of the draft EIR and EIS. We have divided our comments for each document, although some of our issues and questions are relevant to both and there may be some overlap.

### COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

We agree that Alternative C would be the most environmentally damaging of the four alternatives because it would fill wetlands and, therefore, should not be reviewed further.

Alternative B would impact wetlands at the south end of the runway and include moving a levee. The location of the levee construction should be shown on a figure and describe the height of the new levee segment, the width of the base and top, and whether the levee work would require filling of wetlands.

Alternative B would require a lot line adjustment. What other property and other owner would this involve? Has that owner agreed to the adjustment? Why is the adjustment needed?

According to the DEIS, (p-1-6) the overall operations are forecast to increase at an average annual growth rate of 2.0 percent. The percentage of operations by each aircraft category is assumed to remain unchanged. The basis for making the projected estimates for each aircraft type should be discussed. How are these conclusions made? How is it determined, for example, that multi-engine piston aircraft would decrease slightly, single-engine piston aircraft would increase slightly and turbine and helicopters be expected to increase by 2.9 percent annually?

The project sponsor's stated purpose for the project is "to allow existing aircraft at DVO to operate at Maximum Gross Take Off Weight under hot weather and other adverse conditions." 5 to 10 % of the annual take-offs are weight restricted, yet "The percentage of aircraft affected by this condition is expected to remain relatively constant in the future." (p. 2-2) We would think that the proposed improvements would make Gross more attractive to pilots. How accurate are growth projections for the airport operations? Have past projections generally been over or under actual operations conditions?

Safety is mentioned as a reason for the project. What is the safety record for the airport? How many accidents have there been in the airport's history, and how many accidents and of what type occur annually at Gross? How does this accident record compare with airports of similar size? What reduction in accidents can be expected as a result of the expansion?

The DEIS states that the proposed extension "would not attract aircraft that are notably larger (i.e. commuter aircraft) due to the limitations of the strength of the runway pavement width of the runway and the distance between the runway and the taxiway." What is the current strength of the runway pavement? Why couldn't the runway simply be resurfaced?

Are there any restrictions (e.g. FAA permits) or process requirements that would or could limit the number of aircraft landing and taking off at Gross?

The discussion states that the project "would allow aircraft currently using DVO to operate at full payload without being restricted by surrounding terrain or, in most cases weather conditions." All airports, even SFO and Oakland, are limited by weather conditions. Post-project, would current users be able to operate no matter how high the temperature? What other weather conditions besides hot weather would impact operations?

The descriptions of the site state that the area is "nearly flat" with meandering sloughs and drainage channels, within the original floodplain of the Petaluma River and that the lands are protected by two levee systems constructed "along the Petaluma River to reclaim the area." (p. 4-39) It should be clearly stated that the facility is built on former tidal marsh and therefore on bay mud. The nature of bay mud is such that structures and facilities built on this substrate are subject to differential settlement. At Hamilton Field settlement continued as more and more fill was placed on the runway. What is the experience with differential settlement at Gross? How is the preferred alternative expected to affect settlement of the runway?



4.6

Would the preferred alternative have any impact on the flight pattern of the aircraft over the marshes in the vicinity. Would planes be more likely or less likely to take off and come in for landings over the marshes? Would the preferred alternative remove or reduce the risk of bird strikes which would be a benefit to both the birds and aircraft?

5.1

On page 3-16 there is a statement that Alternative B "...could be inconsistent with FAA bird-aircraft strike hazard minimization guidelines." There is a discussion about Army Corps of Engineer's mitigation guidance on page 5.10-12, but we could not find any discussion of the FAA guidelines. The FAA guidelines should be presented and discussed.

5.6

The discussion on page 4-68 reports that man-made drainages and the brackish marsh area north of the runway are habitat for the endangered salt marsh harvest mouse (SMHMM) and that endangered clapper rails could seasonally forage in areas to the south. We agree, and also note that portions of the site likely provide high-tide refugia habitat for both of these species.

12.10

Table 5.7-1 should include Martin Audubon Society property nearby adjacent to the Petaluma River and the Bahia Community as a resource. Martin Audubon owns 60 acres which includes tidal and seasonal wetlands, and walking paths that are well used by the public.

10.2

Table 5.10-2 indicates that Alternatives B would require filling of 11.83 acres. According to the discussion on page 5.10-4, the area of wetland disturbance would be 22.93 acres. The endangered species/wetland discussion states (p. 5.9-11) states "...it is assumed that temporary impact areas would be revegetated in a way that would continue to provide habitat for upland habitat for threatened and endangered species." It cannot simply be assumed that the impacted areas would be revegetated. There must be specific requirements as to the location, plant species to be planted etc. required of the project sponsor as mitigation. Also stated in that discussion is "for purposes of determining wetland impacts," all wetland losses are determined to be permanent losses." Therefore, the actual area needing compensatory mitigation should be 22.93 acres not 11.83 acres.

13.3

13.12

Burrowing Owl surveys should be conducted now and again before project construction is initiated. It should be known whether and where they are roosting as well as nest. Mitigation by constructing burrows to replace any nesting or roosting burrows that would be lost or disturbed should be required.

12.6

We strongly disagree with the priority listing for mitigation. The most obvious bank site is on the California Department of Fish and Game (DFG) lands adjacent to the airport. Even if there were credits available, use of this bank would be unacceptable as the habitat is almost non-existent and the restoration efforts appear to have failed. Also, seasonal ponded wetlands such as exist on-site are the type of wetlands that would attract birds that would present the highest potential for collisions: Rocking shorebirds, dabbling ducks and gulls. Also, an incentive program is also unacceptable because such fees are often not used in a timely fashion or it may take so long to identify a project that the mitigation provided is under the required acreage of both federal or

13.13

state guidelines.

13.11

USACE mitigation requirements reportedly state that "compensatory mitigation project should not be located where they will increase the risk to aviation by attracting wildlife to areas where aircraft-wildlife strikes may occur (i.e. near airports). While on-site mitigation and in-kind could attract birds, there are areas nearby that are both feasible, would not pose risk to planes and would have great environmental benefits.

13.11

Most of the off-site areas mentioned in the EIS would be unacceptable because they are in other counties, far from the site of loss. Cullinan is at the west end of Highway 101 and other sites mentioned are also some distance away in other counties. The preferred mitigation should be on-site or as close as possible to the site of loss.

13.14

The most promising and potentially beneficial mitigation option is the referenced off-site restoration by a private entity on an adjacent property. This site offers the opportunity to participate in a larger project that would both permanently protect and restore wetlands. If tidal marshes can be created instead of seasonal, the potential for use by the two aforementioned endangered species greatly increases and the potential for use by the species that are the most potential collision concern. Fully vegetated tidal marshes are used by isolated birds that move and forage and hide among the vegetation, not used by flocking shorebirds and others that prefer open areas to see predators coming. See the discussion under CONCLUSION below.

#### COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

13.15

Although shown on the figure the description of the proposed project should state that the safety areas would also be extended to the south 240 foot X 120 foot. How much wetlands of what type would need to be filled in this area?

3.8

The status of the lands on which the cross wind-runway would have been constructed should be discussed. A second runway design extending to the northeast and southwest was planned for more than 20 years. These lands were specifically excluded by Fish and Game when they acquired the adjacent lands. The current status of this proposal should be discussed. Does the county still own this parcel? What is the potential for this design to be resurrected? Because it is not in the current expansion design, the County should consider transferring the strip to the owner of the adjacent land, the Department of Fish and Game.

2.1

Growth Inducing Impact discussion indicates that the proposed project is not intended or expected to cause unforecasted growth in the aircraft operations. We are concerned about possible growth in air traffic, not increased housing or commercial development. Even though increased air traffic may not be expected, it still could occur should the economy and/or conditions at Gross change. For example, this project would eliminate constraints. More small and larger planes such as business jets could be attracted to the site, particularly as other developments, such as the new Lucas project, are built in the county. This potential should be further discussed.



2.3

How are forecasts for growth projections formulated? Are they usually accurate? What is the accuracy history of past projections?

2.5

Discuss the potential for growth in the number of planes based or housed at the airport. Is there space in existing hangars and aprons for tie-downs and T-hangers? Why would the project not increase the desirability of the airport for pilots to house their planes? What limits are there on additional hangars and tie down areas being constructed? Is there a local or federal process for expanding these facilities?

13.7

Exhibit 3-2 does not show the locations where the levee would be extended. Please include more information about the levee extension (the height, width and location) and show the area of extension on a figure. Would the levee extension require filling wetlands? If so, where?

5.7

In addition to the built features, the discussion of Land Use Setting and location should address the various seasonal and tidal wetlands and other habitat areas in the vicinity of the project site. The airport is bordered on the east and south by open lands including seasonal and tidal wetlands, woodlands, agricultural lands and other open/undeveloped lands.

13.2

The discussion of compliance with the Marin CWP wetland policies on page 4.2-10 is vague. The project would only comply with the wetland policies if mitigation wetlands are created at a ratio of 3 acres restored to each 1 acre filled with no loss of functions or values on-site or close to the site of loss. Meeting these requirements is not assured at the current time. A number of the sites discussed would not comply.

26.2

Mitigation Measure 4.3-2 for Expansive Soils calls for overfilling of the site and allowing several years before establishing the final top fill elevation, as well as further investigation by an engineer of measures to further reduce this impact. We are concerned about several of the measures suggested: chemically treating the soil to reduce plasticity and expansion potential, and replacing existing expansive soil with non-expansive soil. Chemical treatment would introduce toxic substances that could leach into waterways and have adverse water quality problems. Soil replacement would require the importing of soil from offsite. Traffic and air quality impacts of this measure would need to be addressed and the location where the imported soil would come from should be examined to ensure the soil quality is acceptable. These potential impacts should be discussed in the EIR.

26.2

Mitigation Measure 4.3-3 for Expansion and Settlement of Soils would be addressed by overfilling the site and allowing several years before top filling. Similar to the mitigation above, a range of additional alternatives include several of concern: mixing soils with cement or lime and constructing the runway on piles. The potential for water quality impacts using lime or concrete and the potential impacts of noise impacts from driving piles on endangered species including fish and birds in the vicinity should be addressed.

26.2

Mitigation 4.3-4 and 4.3-5 for Liquefaction and Cyclic Softening calls for possible use of deep

26.2

soil mixing and possible structural solutions. As above, impacts of soil mixing and structural solutions need to be addressed if these activities are options.

13.16

As pointed out at 4.5.1.2 high Brackish marsh or seasonal wetlands is the major plant community and result from the placement of levees around and removal of tidal waters from tidal marsh. As shown on Exhibit 4.5-1 they exist primarily at the north end of the existing runway where the major extension would occur. These wetlands usually are fed by winter rains and raising groundwater in winter, and are dry in summer. For this reason, and contrary to the discussion at 4.5.1.2, they do not typically support such species as song sparrow, which inhabit high tidal marshes or marsh wren. They provide winter and spring foraging habitat for migratory shorebirds and dabbling ducks and some nesting, such as by killdeer which prefer open barren areas for nesting. In summer, they are foraging grounds for raptors and other grassland species.

12.11

The species list should also include California Black Rail, a threatened species, which inhabits nearby Black John slough.

13.12

The area of disturbance is described as 23.35 acres with 11.83 of those acres being permanently lost due to filling, excluding the drainage ditches which are being replaced by the project. Mitigation should be provided for the wetlands temporary lost if only by revegetating the damaged areas. See further discussion under the DEIS.

13.15

Discuss the reason for filling .33 acres of wetlands on the south end of the site, as shown as Permanent Impact Area 31 on exhibit 4.5-2.

13.11

Mitigation 4.5-1 for Wetland Acreage to be Filled, concerning potential compensatory mitigation alternatives, the discussion should state that the Marin CWP, in addition to the points mentioned above, does not provide for use of mitigation banks or in-lieu fee programs. We have no problem with mitigation wetlands being created off-site, due to the nature of the project as long as the off-site location is as close as possible to the site of loss. This policy calls for on-site or as close as possible are the preferred mitigation locations.

13.11

The EIR should discuss the lack of compliance of the potential mitigation sites at the San Pablo Bay Wildlife Refuge and other out of county locations with CWP policy BIO-3.d. which states that "mitigation should be close to the site of loss."

13.17

As discussed above, we strongly object using a mitigation bank or in lieu fee because suitable mitigation sites exist. We also note that the Regional Water Quality Control Board also does not support mitigation banks.

13.11

The San Francisco Bay Joint Venture maintains a list of projects, but does not actually do projects. Other in-county mitigation opportunities exist in Marin at the Corte Madera Ecological Reserve



13.12 Mitigation 4.5-2b to protect SMHM, calls for removal of vegetation thereby removing vegetative habitat and these lands would no longer be considered harvest mouse habitat. This appears to conflict with the discussion in the DEIS which "assumes" that these denuded lands would be revegetated. Mitigation should be provided to compensate for temporary or permanent removal of SMHM habitat. A figure should be included showing the area of SMHM habitat. It is unclear whether this is actually the wetlands previously identified.

13.11 Mitigation 4.5-2c states that mitigation areas for the SMHM are the same as for the clapper rails and that "the mitigation for CCR will occur in tandem with the mitigation for the SMHM as they are both associated with high brackish marsh habitat." These species are both associated with high tidal marsh habitats and associated uplands. These habitat types should be provided as mitigation close to the area of loss so these endangered species can benefit.

13.13 Mitigation 4.5-2d states that Construction Impacts would be mitigated by doing the work during summer and fall dry periods. The CCR non-breeding season, and therefore the allowable work window, usually does not begin until September 1 and extends through January.

13.3 According to the discussion at 2.8.2.1 the airport sponsor must develop a Mitigation Plan for the wetlands to be lost. A mitigations plan should be prepared and presented in the Final EIR/S.

18.1 Impact/Mitigation 4.6.2.2 Temporary increase in traffic due to construction should address the additional truck traffic that would be needed to import soil should this mitigation be chosen to address expansive soils, liquefaction and settlement.

4.7 Mitigation for noise impacts needs to discuss the impact on endangered species from hammering of pilings as is possible under Mitigation


#### CONCLUSION

13.11 We emphasize that mitigation for wetland impacts of this project should take place as close as possible to the site of loss. The Binford Road property is the preferable location because of its proximity, availability and threat of loss if it is not acquired, and the ability to restore the needed habitat types. We have been working with the owner of this property and would welcome the opportunity to work in partnership with the Airport to ensure mitigation takes place in a manner that benefits species that use the area and that ensures the habitat functions and values are not diminished by the airport expansion. Mitigation on this site would benefit the two endangered species of concern and would greatly diminish the risk of bird-plane collisions from existing conditions.

Thank you for considering our input.

Sincerely,

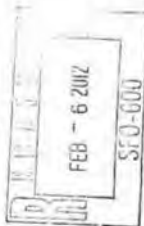
  
Barbara Salzman, Co-Chair  
Conservation Committee

  
Phil Peterson, Co-Chair  
Conservation Committee

A Chapter of the National Audubon Society



# Gross Field Community Association GFCA



## GNOSS FIELD COMMUNITY ASSOCIATION



Mr. Doug Pomeroy  
U.S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835

February 4, 2012

Re: GROSS Field Airport Proposed Runway Extension EIS and EIR

### WHO WE ARE

The GROSS Field Community Association (GFCA) is an organization of pilots and supporters of aviation in general and GROSS Field in particular. We have more than 115 active members. None of our members owns a jet.

This letter is written to express our general satisfaction with the EIR/EIS (hereinafter referred to as the Report), but also to add compelling information supportive of the runway extension.

The focus of our comments will be on statements made in the Report regarding noise. We will also address how the runway extension provides environmental improvements for the local bird population and safety for aircraft operating in the area.

### NOISE REDUCTION

The EIS addresses several alternatives for the runway extension. We support Alternative B which extends the runway to the northwest. As to Alternative B, the Report concludes in Chapter Five, page 5.1-9 that "...no significant noise impacts would result from implementation of Alternative B." To the extent that there would be no significant negative impacts, we are in full agreement.

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To complete the noise discussion, however, the Report should report the positive impact of noise reduction. Changes in Flight Tracks as a result of the runway extension will provide significant noise reduction. Although the Report addresses Flight Tracks in Chapter 5, page 5.1-6, it misses a significant point which would seem to mandate a new analysis of decibel levels.

As noted in the Report, the runway extension adds 1100 feet on the north end of the existing runway, providing initial separation of that distance from the neighbors for runway 13 departures. While that distance will make a difference in noise, it does not tell the whole story. In fact, when aircraft depart toward the south the neighbors will be subjected to much less noise than is currently the case. Why? Because not only will takeoffs (the noisiest time for aircraft operations) start 1100 feet farther away, but also because airplanes will now be able to fly north of the KCBS towers. For current departures on runway 13, the towers restrict left turns after takeoff, forcing aircraft to "steer clear" a safe distance and, therefore, to be closer to the homes as well as the newly created marshland.

GFCA has prepared the attached Diagram, marked Exhibit A, to illustrate our point. As one can see, if it were not for the towers, aircraft departing runway 13 would be able to turn out through the area where the towers now exist. To provide a safe clearance from the towers, aircraft must fly closer to the homes, a factor contributing to noise for our neighbors.

With the proposed runway extension, aircraft will be able to turn north of the KCBS towers after departing runway 13 as depicted on the diagram. The additional distance separation from the homes is very substantial as the aircraft transition north of the towers, resulting in estimated additional separation from current Flight Paths by 3000 to 3500 feet. This information needs to be analyzed and included in the EIR/EIS.

Adding to the noise picture is the fact that aircraft will be reducing power for climb a further distance from the homes. Reduction in power means reduction in noise.

The combination of greater distance separation than the Report first assumed, and the reduction in power further from the homes, requires reconsideration of the Report's conclusion that there would be no significant noise impacts. **Indeed, both careful analysis and common sense demonstrate that current noise levels will be reduced by the runway extension, a very positive impact for our neighbors.**

### POTENTIAL CHANGES IN USE

Rumors have run rampant that extending the runway would result in major changes in the type of airplanes using GROSS, and have even included representations that we would have airlines



using Gnos. Rumors are easy to start, and sometimes difficult to combat, but at some point in the process must be confronted with facts.

**As to the airline rumor**, there is no basis whatsoever to believe Gnos could accommodate airlines. First of all, the runway, even at its extended length, would be too short and too narrow to handle aircraft big enough to carry more than ten passengers.

The one instrument approach procedure for Gnos (affected by the hills and towers) is dreadfully insufficient to handle airline needs even if the runway and facilities could. When it is cloudy and or foggy, aircraft cannot go below 1,000 feet unless the pilots can see the ground and make a normal landing. The Gnos landing restriction would be a major factor for any airplane owner/passenger who is on a schedule requiring deadlines, and be especially important to an airline.

In addition, no economic case can be made for an airline operating out of Gnos. Given the very limited passenger loads our runway length (even as extended) would allow, and the runway width, there is no way an airline could survive. Gnos does not have the infrastructure to handle commercial traffic, having no place for waiting rooms, baggage areas, food or adequate restrooms. Surprisingly, Gnos does not even have a sewer system!

**Regarding the potential for increase in jet traffic**, GECA adds the following comments to the Report.

The few jets Gnos now hosts are most often flown with less than full fuel or passenger loads due to the short runway. They go elsewhere to refuel, spending money which would otherwise be spent in Marin. For those aircraft based on Gnos, (we believe there are only 4 or 5), having the longer runway would not mean more flights. It would mean more efficient and safer flights.

The analysis of whether Gnos would see additional jet traffic should include two scenarios: first, whether any jet owners whose aircraft are of the size we currently have would transfer to Gnos; second, are any jet aircraft larger than we currently have likely to transfer to Gnos?

A review of jet aircraft types, ranging from heavy jet to very-light jet and their runway requirements makes it clear that there are only a few more jets which would be able to land and depart at Gnos with the longer runway. The attached list of jet aircraft, marked Exhibit B, provides information supportive of our comments herein. When reviewing the list, it is important to remember that for these jets there are takeoff limitations which must be considered when the runway is wet. These jets have to be able to accelerate to a decision

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speed and then be able to abort the takeoff and stop within the remaining runway. This requirement would eliminate Gnos as a viable airport for most jet operations any time the runway was wet.

As can be seen from the attached list, the jets that would be able to land and depart at Gnos (with full fuel and passengers) remain in the "very light jet" and "light jet" category. Generally, this means jets with a maximum passenger load of 6-8. There are only two jets, the Cessna Sovereign and the Embraer Legacy 450, which can carry 9-12 passengers and which fall in the mid-size category. By the way, no airline uses those jets because they are simply too small.

Another limiting factor is that Gnos doesn't have adequate hangar space or "Jet Center" accommodations as do Napa and Santa Rosa, both of which have many more amenities than Gnos.

Opponents of the runway extension have expressed concerns that Gnos would be "expanded" to accommodate jets and businesses supporting them. The opponents note that the idea of a "Jet Center" was explored over a decade ago by a private company. The "Jet Center" idea involved a proposal to connect the airport to approximately 50 acres of neighboring private land. It is very important for our opponents to know that the runway extension proposal from the County is totally unrelated to the earlier private proposal and does not in any way include the subject private property. Further, any effort to use adjacent land to create a jet center facility (for any other facility) would require an EIR of its own.

Jets are a major investment, and without multiple and varied instrument approach options, supporting infrastructure, Gnos will always have limited appeal to jet traffic. The simple conclusion that a few more jets would have the opportunity to land at Gnos cannot translate to a statement that they will.

In quick summary, review of the runway requirements for larger jets makes it abundantly clear even the extended runway is way too short and the width inadequate. There is no credible case to be made for airline operations. Whether any jets are in the area (Napa or Santa Rosa) now and whether they would transfer to Gnos or land at Gnos if a longer runway were available is purely speculative.

**A fact not to be forgotten is that current jet operations will be much quieter for our neighbors if the runway is extended.**

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**SAFETY**  
Gross is noted for its crosswinds. The wind direction, the wind velocity, and the fact that the winds can be different from one end of the runway to the other all combine to create challenging conditions. A longer runway will give all aircraft using the airport more time to stabilize approaches to landing when the crosswinds are blowing. More time to stabilize will result in fewer bailed landings from low altitude and at low speeds, a combination which increases risk.

The further aircraft operate from the homes, the less chance of an accident or incident near the homes.

The runway 13 departures will also keep aircraft further away from the recently completed Marsh Restoration Project which has resulted in increased large bird activity. Birds of all sizes are hazardous to aircraft, and large birds such as the pelicans benefitting from the Marsh Restoration are especially hazardous. Captain Sullenberger and his U.S. Air crew can so testify.

Because birds and aircraft do not mix well, the planned runway extension will reduce the bird strike hazard. Beneficiaries of this result are the aircraft, its passengers, the birds and, potentially, neighbors who might be near an aircraft disabled by a bird strike.

#### ENVIRONMENTAL BENEFITS FOR THE BIRDS

As noted herein, a large Marsh Restoration Project was completed near the airport over the last several years. The success of the project from a bird population standpoint is obvious. It is equally obvious that the birds would benefit from less noise and from a safety standpoint if aircraft departing Gross were further away. The Flight Path diagram clearly demonstrates how runway 31 departures are now very close to the Marsh, and also how departures would be much further away if the runway were extended as proposed.

#### FINAL COMMENTS

The inescapable conclusion seems to be that if the aircraft using Gross are flying farther away from homes and the Marsh Restoration area, noise will be reduced and safety enhanced. The result is the classic win/win for the airport, for the County of Marin and all the agencies using Gross, for the environment and for our neighbors.

Respectfully Submitted,

Gross Field Community Association Board of Directors

451 Airport Road  
Novato, Ca 94945  
www.grossfield.org

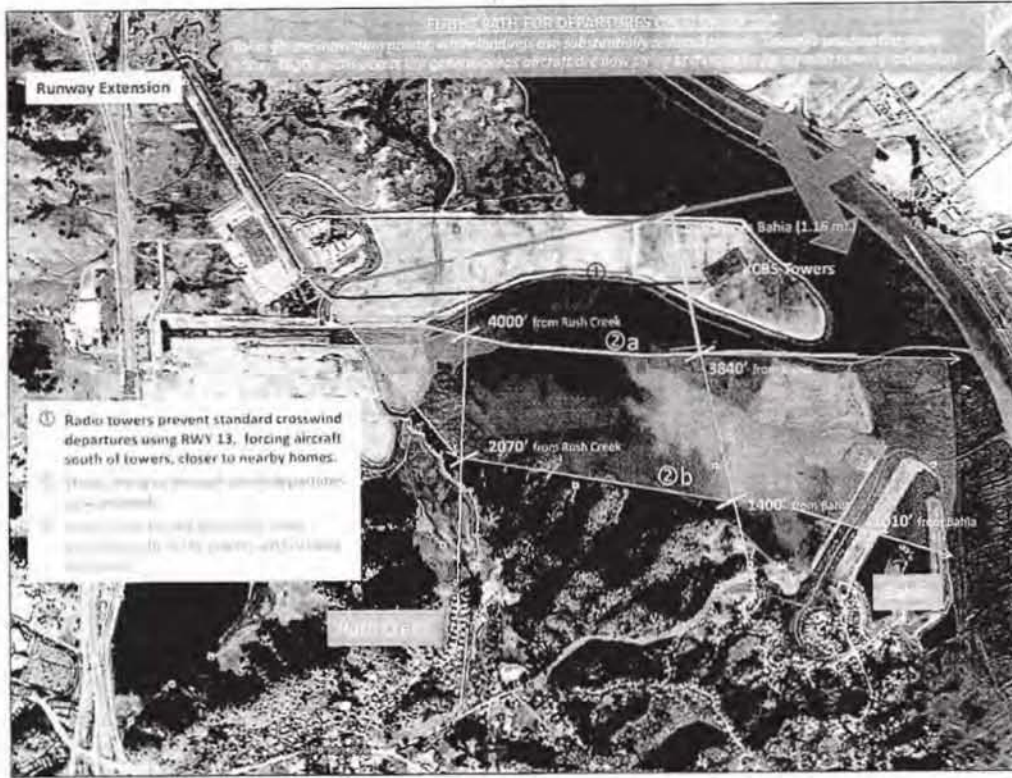
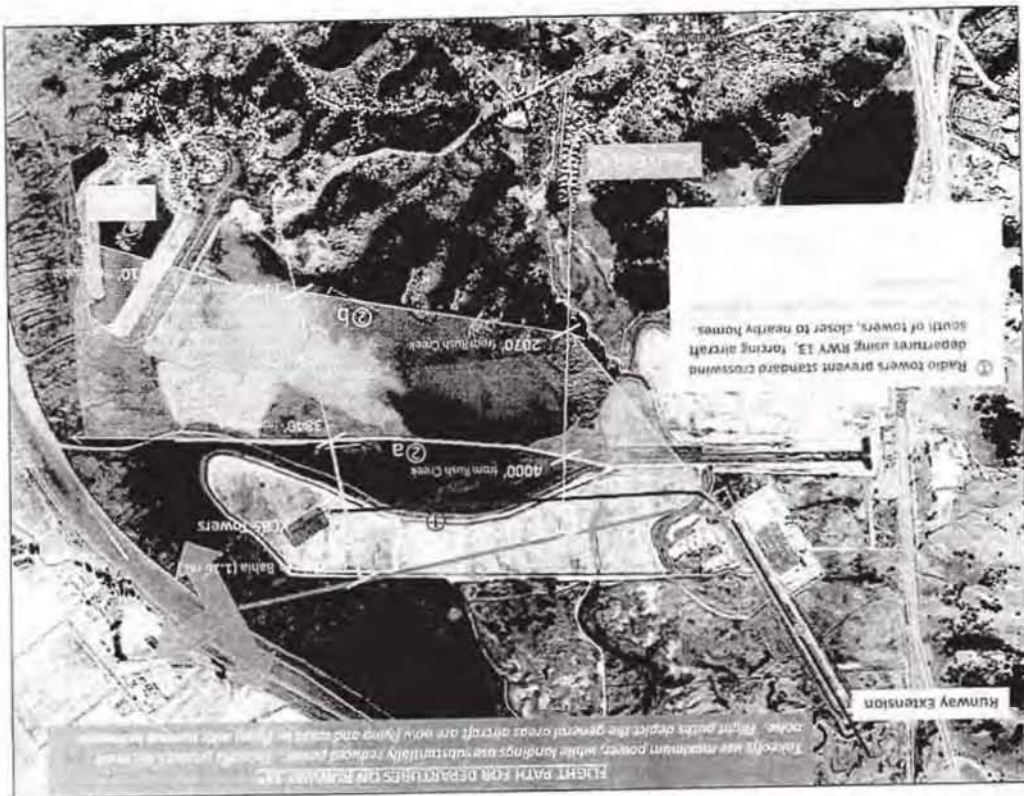


EXHIBIT A



Gloss Field Community Association  
Public hearing handout



GCRA  
Steve Knecht

Take off Distances for Most Private/Corporate Jet Categories and Aircraft				
Aircraft	Model	Typical # Passengers	MTOW	Category
Commercial	1 Boeing 737-400	124	80,000-100,000	1
	2 Boeing 737	180	80,000-100,000	2
	3 Boeing 747-400	400	80,000-100,000	3
	4 Airbus A380-800	500	80,000-100,000	4
Private	5 Cessna 441	4	4,000	5
	6 Cessna 441	4	4,000	6
	7 Cessna 441	4	4,000	7
	8 Cessna 441	4	4,000	8
Corporate	9 Bombardier CRJ-900	37	54,000	9
	10 Bombardier CRJ-900	37	54,000	10
	11 Bombardier CRJ-900	37	54,000	11
	12 Bombardier CRJ-900	37	54,000	12
General Aviation	13 Cessna 441	4	4,000	13
	14 Cessna 441	4	4,000	14
	15 Cessna 441	4	4,000	15
	16 Cessna 441	4	4,000	16
Light	17 Cessna 441	4	4,000	17
	18 Cessna 441	4	4,000	18
	19 Cessna 441	4	4,000	19
	20 Cessna 441	4	4,000	20
Very Light	21 Cessna 441	4	4,000	21
	22 Cessna 441	4	4,000	22
	23 Cessna 441	4	4,000	23
	24 Cessna 441	4	4,000	24
Light	25 Cessna 441	4	4,000	25
	26 Cessna 441	4	4,000	26
	27 Cessna 441	4	4,000	27
	28 Cessna 441	4	4,000	28
Light	29 Cessna 441	4	4,000	29
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	31 Cessna 441	4	4,000	31
	32 Cessna 441	4	4,000	32
Light	33 Cessna 441	4	4,000	33
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Light	37 Cessna 441	4	4,000	37
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Light	41 Cessna 441	4	4,000	41
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Light	65 Cessna 441	4	4,000	65
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Light	69 Cessna 441	4	4,000	69
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	72 Cessna 441	4	4,000	72
Light	73 Cessna 441	4	4,000	73
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Light	77 Cessna 441	4	4,000	77
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	80 Cessna 441	4	4,000	80
Light	81 Cessna 441	4	4,000	81
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Light	85 Cessna 441	4	4,000	85
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Light	89 Cessna 441	4	4,000	89
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	91 Cessna 441	4	4,000	91
	92 Cessna 441	4	4,000	92
Light	93 Cessna 441	4	4,000	93
	94 Cessna 441	4	4,000	94
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	96 Cessna 441	4	4,000	96
Light	97 Cessna 441	4	4,000	97
	98 Cessna 441	4	4,000	98
	99 Cessna 441	4	4,000	99
	100 Cessna 441	4	4,000	100

Exhibit B

All distances are based on maximum take off weight of aircraft (MTOW allowed). Categories are divided by weight and impact on water turbulence. Weight categories exceed the weights as follows: Heavy > 135,000 lbs.; Large > 135,000 lbs.; Small < 135,000 lbs. Almost exclusively, aircraft landing at Gost will be in the 6-18 passenger category. This means "very light", "light", or "mid-size" aircraft of 6-18 passengers.



2007-11-11

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Re: Gross Field Airport Proposed Runway Extension EIS and EIR

The Black Point Improvement Club has several concerns with the environmental documents for the above noted project, including:

1. The absence of accurate data for the volume of flight operations at Gness Field and therefore the use of general statistics for estimating future volume is troubling. This concern is intensified since Marin is considered to have a relatively high income per capita.
  2. Is there a limit as to number of flight operations the extended runway could support without a control tower? For example, 124,300 operations are projected for 2027. If 88% of those occur during the 7 AM to 7 PM time frame, it would result in an average of 9 operations per hour. Table E-6 shows a dramatic difference in use between day and evening and night hours. If a major cause for the difference is natural light, one could assume that the day volume might be concentrated in those hours when daylight is present resulting in an even higher number of operations per hour during daylight periods. Might there be a similar difference based on time of the year?
  3. The ratio of types of planes that currently use the airport remains fairly constant in the analysis. If the extended runway will permit the larger planes with full loads to land safely, would not the use of those planes increase?
  4. The reports indicate that the extended runway would not support planes larger than those currently using the airport because planes with wing spans of greater than 49 feet require a wider runway. Would this only lead to a proposal, at a later date, to widen the extended runway? Would a mitigation to exhaust future expansion of the runway, either by length or width, be appropriate? What would prevent planes larger than those now using the airport from attempting to use the extended runway, even though it may not meet width requirements? What preventive or punitive measures can be taken to prevent the use by larger planes?
  5. The noise analysis did not seem to take into account those pilots that violate noise abatement routes. While the violations may not be frequent, they may well be the basis for much of the concern about noise. Without a control tower, how can those rogue pilots be identified and penalized?
- Thank you for your consideration.

**L**icensed by the Department of Education  
Thank you for your consideration.

Very truly yours,  
  
 E. Henry Barner  
 President



Bass

COMMENTS  
PUBLIC HEARING  
GROSS FIELD AIRPORT - Extend Runway 13/31  
ENVIRONMENTAL IMPACT STATEMENT and concurrent  
ENVIRONMENTAL IMPACT REPORT  
January 10, 2012

FEB - 7 2012

SEAL

NOISE LEVELS

4.10 [ Include the actual published noise levels of any jet likely to use a 4,400' runway at Gross in the EIR so people can see the real quantities.

New Cessna jets are quieter on departure than their 206 piston model, per Cessna's published specifications. On approach they are not quieter but this can be changed with pilot technique. And since the approach to runway 31 is so steep, I approach at low or idle power settings when flying jets into runway 31.

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WET RUNWAY PERFORMANCE

20.5 [ Wet runway performance was never mentioned in the meeting. Some of the jets based at Gross can land in the rain but I know of none of them that can legally takeoff when the runway is wet.

This is because jets have to be able to accelerate to a decision speed and then abort the takeoff and still stop within the remaining runway. Turbo-props and piston twins do not have this legal requirement, but having flown them out of Novato, I'm positive that many of them wouldn't make this requirement on a wet runway either. So wet runway safety needs to be presented with supporting accelerate-stop data for jets, turbo-props, piston twins and even high-performance single-engine airplanes likely to use Gross.

PUBLISH NOISE ABATEMENT PROCEDURES

4.11 [ Post a noise abatement departure diagram near the runway area of runway 13. Publish noise abatement notes in airport directories.

MONITOR NOISE IN THE NEIGHBORHOODS

4.12 [ I don't know if this is possible because there is no control tower that can record takeoffs and landings. But people who consistently fly over the neighborhood could be handled this way. They do this (somewhat severely) at Santa Monica and have been able to keep their airport for decades in a very airplane-hostile environment. I see a plane doing an overflight of the homes about once or twice a year. I don't think this is that common, such a measure would eliminate the guesswork here.

EXTRA SAFETY IN GUSTY WIND SITUATIONS

19.4 [ If a pilot has a longer time to get the plane on the ground in gusty conditions they are less likely to panic and make an error. I used to teach at Gross and can attest to this. Makes a big difference.

16.1 [ AIRPORT LIGHTING

Airport lighting - won't change much for nearby residents - just another 1,100 feet of relatively dim runway lights. This should be shown in the EIR somehow, perhaps by adjusting a photo of the airport with photoshop.

19.4 [ TERRAIN CLEARANCE SAFETY

Pilots departing runway 13 will be in a much safer situation since they will be much higher and better able to maneuver to the Northeast, away from the hills before reaching them. With the current runway, some planes have to start their turns below 250' to avoid overflight of the hills.

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy  
U.S. Department of Transportation  
Federal Aviation Administration  
San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835

From (Please Print):

Name: Wright Bass

Address: 10 Reade Lane, #2

Sausalito, CA 94965



Jackie Bonner  
170 Saddle Wood Drive  
Novato, CA 94945  
February 6, 2012

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

Fax: (650) 872-1430

By Fax and US Mail

RE: Gness Field Airport - Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:


4.5 I live in the Rush Creek community, just south of Gness Field airport in Marin County. While most of the pilots who use Gness Field do follow the Noise Abatement Guidelines, there are numerous planes that fly directly over my house - especially on the weekend. Almost all these over flights occur on landing. My house is located about half way down Saddle Wood Drive, so I am sure the situation is far worse for those living in homes closer to the airport.

3.9 I am aware that the future plan for Gness Field calls for a 4,400 foot runway. I am most assuredly in favor of improving the airport's safety by lengthening the runway; however, I also understand that both the Draft EIR and the FAA's Advisory Circular state that a 3,500 foot runway meets the safety requirements of the current objective (i.e. very light planes - B1 planes). The 4,400 ft length mentioned in the Master Plan is specifically suitable for 10+ passenger planes - not the types of planes included in the current objective.

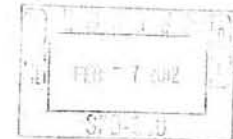
2.1 Not only does the Master Plan mention 10+ passenger planes and note possible commercial uses, there is also a letter from Sunset Aviation submitted as Appendix D to the EIR stating that they are hoping to bring in larger planes after the expansion. I and other residents of Rush Creek do not want large, heavy, ten plus passenger jets flying over our homes (which they most assuredly will) - albeit accidentally. Assertions that there will NOT be larger planes using Gness Field defies logic. Of course they will!

3.2 Please give your consideration to shortening the proposed length of the runway so that there is safety for B1 planes using the airport, but doesn't allow larger planes to take off and land unsafely. A shorter runway addresses the concerns of pilots of B1 type aircraft as well as those of local residents.

Thank you for your consideration of this important matter.

  
Jacqueline A. Bonner

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## COMMENT FORM

### PUBLIC HEARING

**GNOSS FIELD AIRPORT – Extend Runway 13/31  
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*  
ENVIRONMENTAL IMPACT REPORT  
January 10, 2012**

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gness Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

2.1

4.8

4.5

Regardless of what is being said, there is no question to me, that a longer landing strip will lead to more & bigger planes & that means more noise.  
The current crop of airplanes already improperly fly down Saddle Wood Dr. & now it will make things unbearable.

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835  
Fax: (650) 872-1430

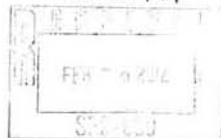
FROM (Please Print):

Name: David Donadio

Address: 200 Saddle Wood Dr.  
Novato, CA 94945



Duckworth



February 3, 2012

Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Blvd. Suite 220  
Brisbane, CA 94005-1835

Re: EIS & EIR for Gness Field - Novato, CA

Dear Mr. Pomeroy,

24 [ As the owner of a small airplane based at Gness Field, I strongly favor the runway extension. The issue is not big corporate jets or future commercial jet service. This is a red herring.

[ This is about safety. The safety of over 200 pilots based at Gness Field, and the safety of the pilots' families and the safety of their passengers. One could also make the argument that it is even about the safety of the airports' neighbors.

19.4 [ The current runway length is not a problem for only a few hot days for a few jets. There is not a single day in the year that my twin engine propeller plane can leave Gness Field with a full load of fuel and passengers because of the short runway length. Strong crosswinds are also a severe problem for at least half of the year, which could be reduced by extending the runway.

The runway extension will push airport operations 1100 feet further to the North, and it will:

- 19.4 [ a) Keep departing and arriving airplanes 1100 feet further away from the four 500 foot tall KCBS radio towers, which are currently a flight hazard.  
20.4 [ b) Allow our small planes to leave with a full load of fuel and passengers.  
19.4 [ c) Reduce crosswind dangers.  
4.9 [ d) Allow pilots departing to the South to fly higher and turn quicker before impacting the Southern neighbors, significantly reducing noise impacts for those neighbors.

4.9 [ If the Southern neighbors understood or believed this last point, they would be supporting the runway extension. The EIS/EIR report says there will be no additional noise problems because of the runway extension. I believe there will be less noise.

24 [ I am told that of the 9300 arrivals and departures last year, the airport received only 25 noise complaints. That is one quarter of one percent, a very good record for any airport. I hope that the runway extension will have your support.

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Sincerely,

Jim Duckworth  
1555 Indian Valley Road  
Novato, CA 94947  
j.duckworth@comcast.net

cc Marin board of Supervisors



Gilkerson

Comments at January 10, 2012 Board of Supervisors Hearing  
on Gness Field Runway Expansion

My name is Christopher Gilkerson, and I live at 220 Saddle Wood Dr. in Novato. I am one of the signers of the Petition & Comment Letter. A number of us will also be submitting a more extensive comment letter by the Feb. 6 deadline.

I would like to elaborate on a few key points in the Petition: (1) the purpose of the expansion and who it will benefit, and (2) the noise impact of the proposed runway extension.

1.6 First, what is the purpose of extending the runway a full 1,100 feet? There is only one cited in the draft EIR: to enable corporate jets to takeoff with full fuel capacity on those few hot days when they plan to travel long distances. That's it. It is not for emergency preparedness. That purpose is not mentioned at all in the draft EIR and really doesn't make sense anyway.

It's also not to enhance the safety for the current users of the airport. The widening of the runway several years ago served that purpose to compensate for the crosswinds there, as will the proposed extension of the runway safety areas at each end of the runway and extending the taxi area, which I support. Now you ask any pilot if they would like a longer runway, and chances are they will say yes. It's like asking taxpayers if they would like to pay lower taxes. But the purpose has to be supported by data.

1.4 Even those very few corporate jets that call Gness home don't need an extended runway for safety purposes. Today they simply reduce their fuel weight on a few particularly hot days when they are want to travel a maximum distance, such as to Denver. There is no evidence at all in the draft EIR indicating how many actual takeoffs have been impacted in that manner.

20.1 A key unanswered question is: Who is the 3%? Who owns and uses the dozen or so corporate jets that, according to the draft FEIR, are the 3% who will benefit from the runway extension. How do their interests weigh against the hundreds of home owners to the south of the airport who will be negatively impacted by the noise created by any increase in over-flights? The County - meaning the Board of Supervisors - should be transparent about the interests it chooses to champion and why or better yet, try to balance those interests.

3.3

One way to balance those interests is by proposing a smaller runway extension. For a B-I general aviation airport, which Gness Field is, the recommended length is about 3,500 feet to allow small B-I jets to take off with more fuel. The draft EIR makes a mistake in not considering that alternative.

2.1

As for the interests of Gness Field's neighbors to the south of the airport, we accept that from time-to-time there will be occasional over-flights and some noise disturbance. However, our research shows that extending the runway to 1,100 feet will result in a change in the types and sizes of jets that can land at Gness that are faster, louder, and need a larger approach to land from the south over our homes. Although extending the runway to the north may help reduce over-flights from takeoffs to the south, it would seem to do little about over-flights from landings from the south.

In terms of the noise impact analysis in the draft EIR, it has 3 fundamental flaws:

4.14

(1) It is based on sketchy radar data from 2007, supplemented by self-serving undocumented "discussions" with local airport staff and users.

4.8/4.13

(2) It is premised on the unsupported assumption that extension of the runway 1,100 feet won't lead to any change in the fleet mix. There is no analysis at all about the fleet mix at existing airports that have a runway between 4,000 - 4,500 feet.

4.5/4.15

(3) Although dozens of over-flights of jets and prop planes disturbing residential areas are documented in the noise analysis, many at above the critical disturbance level of 65 decibel levels, they are summarily dismissed as follows: "The noise generated by pilot over-flights are not a direct impact of airport operations since airport approach and departure protocols are designed to avoid aircraft over-flights of residential communities. Accordingly, noise resulting from aircraft over-flights is directly related to individual pilot behavior and [are not due to the airport and] therefore, the noise impacts of the proposed project is deemed less-than-significant." [4.7-32]

That is like saying a landfill is not responsible for toxic leaks because people throw away things they shouldn't. The airport's noise abatement protocols are not enforceable rules, some pilots do not follow them, larger jets in the future may not be able to follow them, and it is unclear how, exactly, the airport emphasizes them to current or new users of the airport to avoid over-flights. I called the Gness Field automated weather observation phone number this morning, and there is no mention or reminder of the approach and departure protocols to avoid disturbing the neighborhoods. When we call the airport to complain, we generally get no response.

I appreciate the opportunity to make these comments, and I hope you will consider the points in the Petition.



Gilkerson

## FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Mr. Doug Pomeroy	Christopher Gilkerson, Susan Mathews, Steven Nebb, and Sharon Nebb
COMPANY:	DATE:
FAA, San Francisco Airport District Office	2/6/2012
FAX NUMBER:	TOTAL NO. OF PAGES, INCLUDING COVER:
650-872-1430	8
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Gnoss Field Airport - Proposed Extension of Runway 13/31	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

## NOTES/COMMENTS:

Attached please find our comment letter. The original will be postmarked today, February 6, 2012 and sent via US Mail.

If you need to contact us, please call us at 415-892-3620.

Thank you,  
Sharon Nebb

February 6, 2012

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

Fax: 650-827-1430

**RE: Gnoss Field Airport - Proposed Extension of Runway 13/31**

*By Fax and US Mail*

Dear Mr. Pomeroy:

We are residents of Rush Creek Estates, just south of Gnoss Field. We are submitting this letter to raise questions and concerns about the draft Environmental Impact Statement and concurrent Environmental Impact Report (the "Reports") as prepared by Landrum and Brown, December 2011. The Reports are deficient in a number of critical respects, as outlined below.

1. The stated objective of the project is inconsistent with a 1,100 foot runway extension, whose length is not supported by the rationale or evidence. According to the Reports, the type of plane suitable for Gnoss Field is a B-1, small aircraft with a maximum take-off weight of 12,500 pounds, up to 49 foot wingspan, and approach speed of 91 to 121 knots (page 1-10). The objective of the project is to make the airport compliant for B-1 airplanes under most weather conditions. Specifically, the Reports say the purpose is "to accommodate existing aviation and passenger demand." (2.3) The rationale given for extending the runway is that the "existing 3,300 feet of runway is insufficient to serve a majority of the airport's fleet under most conditions." (2.4; emphasis added.) There is no data at all to support that statement.

20.1 The only evidence proffered in Appendix D is a single February 2008 visit to Gnoss in which the environmental consultant "spoke with airport users." Those users are not listed, nor are the planes they fly. This one-time interview with unnamed users leads to a gross exaggeration: "The majority stated that during marginal or unfavorable weather conditions (high temperature or fog) most aircraft must take a considerable weight penalty with the 3,300 foot runway," and that 3,300 feet "severely limits most of the aircraft in the fleet." This is wholly undocumented.

1.3 In fact, only a dozen or so jets even appear to use Gnoss with any frequency, and it is only those planes that occasionally are inconvenienced by taking-off with less than a full tank, and only in extremely hot weather conditions and only if they are heading to certain more remote destinations. As one pilot at the January 10, 2012 hearing stated, the current runway length probably only impacts about 1% of the fleet about 5% of the time, and those pilots can simply wait to takeoff a few hours earlier or later on those few hot days of the year. (Testimony of Robert Pack.) This is far less than "most of the aircraft in the fleet" as the Reports claim.



The Reports nonetheless attempt to substantiate the 4,400 feet of runway length to support the deemed Critical Design Plane (the Cessna 525 or CJ1+) (Appendix D, page 3). There are a number of problems with this part of the analysis:

- 1.8  
20.8
- a) The 1,100 feet extension (to a total of 4,400 feet) is based on an outdated objective that is not congruent with the Reports' stated objective. The total length of 4,400 feet originated with the 1989 Airport Master Plan (page 4.16). The intention back then was to accommodate planes with 10 seats or more. The CJ1+ aircraft is not in this category.
- 20.11  
20.10
- b) There is no data presented to support that the CJ1+ meets the requirements of 500 operations annually. Mere declaration and assumption of this important baseline factor is wholly inadequate. Furthermore, the erroneous classification for the Cessna 525A and 525B (both B-II planes) as B-I planes confuses the calculations of required runway length (Appendix D, page 3).
- 20.9
- c) Since the proposed expansion is receiving FAA (federal) funding, the project is required to address and use FAA Advisory Circular 150/5325-4B (the "AC") for determining the appropriate length of the runway; there is no mention or consideration of the AC in the Reports.
- The AC states that estimating runway length for fields like Gness consider a "family grouping of planes." This should be addressed by using the charts in the AC. For the objective of serving aircraft of 12,500 pounds or less, figure 2-1 should be applied since planes with 10 or more passengers would exceed the 12,500 pounds objective. While the AC under certain situations allows for consideration of airplane flight manuals in determining runway length, it cannot be done arbitrarily. Some rationale must be given to stray from the methodology set forth in the AC. Other analyses for similar airport expansions have solely relied on the results from the AC. Without the data required to support the need for specific plane usage, any result other than the AC is not valid.
- 20.8
- d) Even if there is justification for designing the runway for a specific plane, the Reports incorrectly state the runway length required for the CJ1+ (Appendix D, page 10). The Reports use 86 degrees Fahrenheit when they should be using 82 degrees Fahrenheit. Making this correction would result in a runway length that is over 200 feet *shorter*.
- 20.10
- e) As stated above, the Cessna 525A and 525B planes have an ARC of B-II, and in order to meet the purpose of the project, should not be considered in the analysis.
- 20.12
- f) The Reports' analysis of runway length adds 400 feet for abnormal conditions; however, there is no objective support for this additional distance and the abnormal conditions are not defined (Appendix D, pages 10-11). Without the support or definition for the condition, it is not possible to determine the distance required or the base length to apply the adjustment. Both the public and decision makers must be given adequate information to allow informed comment and judgment.

- 3.9
- g) According to the AC the necessary runway length for a B-I, small aircraft with a maximum take-off weight of 12,500 pounds, under hot day conditions at sea level should be 3,500 feet. According to the AC, hot day conditions are defined as the average high temperature of the hottest month of the year. The Report references that 82 degrees Fahrenheit is the correct temperature (Appendix D, page 9) for this airport, not 100 degrees Fahrenheit as used in the 1989 Airport Master Plan (page 4.3). If these corrected assumptions are used and the AC is applied, the overall runway length should be 3,500 feet for 82 degrees Fahrenheit.
- 3.2
- h) The 4,400 feet extension would be applicable for 10 passenger aircraft. However, no 10 passenger aircraft meets the objectives of the current project for a small aircraft with a maximum take-off weight of 12,500 pounds or less; nor is the critical design aircraft designed for 10 passengers. Therefore, an alternative using a shorter runway extension should have been considered and it was not.
- 3.3
- i) The Reports only address alternatives that consider a total runway length of 4,400 feet or the current 3,300 feet. An alternative of 3,500 or even 3,600 feet should be considered in the Reports. See section 5, below, for additional comments about the failure to consider the reasonable range of alternatives.
- 2.1/2.2
- 2) Failure to support assumption that fleet mix and usage would not change. The draft Reports do not provide any analysis on how the fleet mix and usage would change as a result of the 1,100 foot extension. The Reports state that larger aircraft would not be attracted to the airport and therefore there would be no change in the fleet mix or the usage of the airport (page 2-5). One reason given is the limitation of the strength of the runway pavement. (3.1.4) But the runway gross weight strength is rated at 26,000 pounds (1989 Master Plan at 2.3), which can accommodate planes much larger than the B-I category. Although the fact the runway is built on compacted mud may require more frequent repairs, it does not prevent larger and heavier planes from landing.
- The law requires that the analysis be based on facts, or reasonable assumptions predicated on facts. The Reports contain neither on this key point. No review was conducted about the airport fleets of the dozens of other airports in North America that have a runway length of between 4,000 - 4,400 feet. Those facts are easily ascertainable. For example, the Billy Bishop Toronto City Airport, Canada's 14<sup>th</sup> busiest, with a runway length of 4,000 feet, includes a fleet of Bombardier Q400 turboprop planes owned by Porter Airlines that can carry 70 passengers. This is not to suggest that the Gness project will result in scheduled commercial airliner traffic, but only that a runway of over 4,000 feet will change the types and size of planes that can land.
- If the runway is lengthened by 1,100 feet, larger non-B-I airplanes could use the airport. The draft Reports provide letters confirming that current tenants at Gness Field (Appendix D, pages 21-25) would purchase and operate larger jets at Gness Field if the runway was lengthened to 4,400 feet. Sunset Aviation states that they would add a BeechJet 400 (B-I with a maximum take-off weight of 16,100 lbs.) and a LearJet (most are C-I up to D-I airplanes) to Gness if the runway was extended to 4,400 feet. None of these aircraft meet the specifications of the proposed project. All of them are larger and louder airplanes. In its testimony at the January 10, 2012 hearing, the Gness Field Community Association admitted that there would be an opportunity for an increase in the number and types of jets, including 10 and 12 passenger jets. (Testimony of Steve Knecht.)



Although current economic demand may not immediately result in additional jet traffic, an EIR/EIS must consider foreseeable impacts. Airport users have stated that they can foresee the use of larger airplanes, thus changing the volume and mix of the fleet at Gness Field.

As noted above, a total length of 4,400 feet appears to be a vestige from the 1989 Airport Master Plan, which states:

The runway length recommendation is to initially develop the runway to a 'General Utility, Stage I' length of 3,800 feet but to ultimately extend it to 4,400 feet to more adequately satisfy the accelerate-stop distance requirements for aircraft with 10 seats or more... (air taxi and commercial operation).

(1989 Airport Master Plan at 4.16). The need for 4,400 feet – based on air taxi and commercial operation needs – is directly contrary to what the Reports now claim, and what Supervisor Judy Arnold confirmed with staff at the January 10, 2012 hearing. But the Master Plan's own analysis supports the case that the fleet mix and usage would change as a result of the 1,100 foot extension.

Based on a runway length of 4,400 feet and various aircraft flight manuals, the following is a sampling of planes that could reasonably use the expanded runway:

Aircraft	ARC	Maximum Take-Off Weight	Take-Off Length	FAR 36 Noise Level-Approach
CJ1+ Cessna 525	B-I	10,600 pounds	3,250 feet	82 dBA
Learjet		13,000 – 20,500 pounds	3,300–4,350 feet	90–100+ dBA
24F/31A/25D/23/40/45	C-I			
Citation II	B-II	13,300 pounds	3,450 feet	80 dBA
Sabreliner 60	C-I	20,200 pounds	3,500 feet	95 dBA
Citation XLS+	B-II	20,200 pounds	3,560 feet	93 dBA
Boeing 400A	B-I	16,100 pounds	3,950 feet	91 dBA
Sabreliner 80	C-II	24,500 pounds	4,380 feet	91 dBA

As demonstrated by the above chart, it is clear that larger, louder aircraft could be serviced by the extended runway. Therefore, an appropriate noise level and environmental impact analysis must be done to consider the impact of a fleet mix change.

**Flaws in the Noise Impact Analysis.** The current analysis of noise level and environmental impact is inadequate. It fails to consider the impact of the larger jet usage once the runway is extended. The purpose of the analysis should be to try and determine the worst case scenario so that any noise level disturbances can be appropriately mitigated. Since two current airport users state that they will purchase and use larger airplanes at Gness Field with a longer runway, a proper noise analysis must be done.

The noise impact analysis is based on sketchy radar data of takeoffs and landings from 2007 instead of more recent actual data, supplemented by self-serving undocumented "discussions" with local airport staff and users. It is also premised on the unsupported assumption – critiqued above – that extension of the runway to 4,400 feet will not lead to any change in the fleet mix. Even

with the current fleet, the Reports document dozens of over-flights of jets and prop planes disturbing the residential areas to the south of the airport, many at the critical disturbance level of 65 decibels or higher. This is summarily dismissed as follows:

The noise generated by pilot over-flights is not a direct impact of airport operations since airport approach and departure protocols are designed to avoid aircraft over-flights of residential communities. Accordingly, noise resulting from aircraft over-flights is directly related to individual pilot behavior and [are not due to the airport and] therefore, the noise impacts of the proposed project is deemed less-than-significant. [4.7-32]

This is not well reasoned or supported by the evidence. The Reports document over-flights because there is an airport. As demonstrated above, larger and louder planes will be able to use a longer runway. These larger and louder planes will need to go further out and come in wider on their final approach from the south, especially if another plane is already in the landing pattern. The Reports ignore the significant negative impact of noise, thereby failing to consider necessary mitigation measures. These would include an ordinance that would prohibit approaches to landing from the south which result in noise disturbance in residential areas. This was specifically recommended in the 1989 Master Plan (Exhibit A), and should be considered in any Final EIR/EIS.

**Failure to consider inappropriate location of the airport.** Gness Field is located in very close proximity to the Redwood Landfill, wetlands, and a waste water treatment facility. FAA Advisory Circular 150/5200-33B states that "Airports that have received Federal grant-in-aid assistance must use these standards." This Advisory Circular, *Hazardous Wildlife Attractants on or Near Airports*, states that these land uses, in close proximity to airports, can cause an increase in aviation related accidents. The advisory circular provides guidance and mitigation recommendations in order to minimize the environmental impact and further promote safety in aviation. There is no reference to this AC in the draft Reports and no consideration is given to the impacts that these land uses might have on an airport extension.

FAA Advisory Circular 150/5200-33B makes it clear that it is undesirable to build or expand an airport near wetlands, landfills, and/or water treatment facilities. Gness Field is located on or near all of these undesirable areas. In this circular, the FAA recommends a separation distance of "10,000 feet ... for any of the hazardous wildlife attractants." The Gness Field expansion would not meet this recommendation as it is less than 5,500 feet from the landfill to the north, and is located on and adjacent to the wetlands and water treatment facilities, respectively. The Reports should address the issue of potential and hazardous air strikes with wildlife.

Additionally, according to the AC, expansions of existing airports into or near wetlands require the preparation of a Wildlife Hazard Management Plan (WHMP).

5. Failure to consider range of reasonable alternatives. Consideration of alternatives is at the core of an EIR/EIS. Under the law, the Reports cannot dismiss readily identifiable alternatives or fail to analyze a reasonable range of alternatives, including those summarized below.



- 3.2 a) A shorter runway extension would meet the stated objective of the project – to better accommodate B-I airplanes – and would substantially lessen the significant environmental impacts of the project compared to Alternative B. A shorter runway extension would reduce noise effects on the surrounding communities and reduce encroachment on surrounding wetlands and wildlife. In fact, Alternative B meets a different objective: to accommodate planes larger than those classified as B-I. It is impermissible to ignore an alternative that better meets the stated objective. In the very least a shorter runway extension would feasibly attain most of the basic objectives of the project and therefore its comparative merits must be evaluated. The conclusory rejection of a shorter runway extension is insupportable.
- 3.2 b) The 1989 Airport Master Plan itself, as amended by the 1997 update (Appendix K), clearly states that consideration should be given to constructing “a 500 - 1,100 foot extension to Runway 13-31 on the north end.” (Resolution No. 97-23, at Exhibit A page 3.) Therefore a runway extension of only 500 feet was within the range of alternatives that the Board of Supervisors itself considered. Instead of considering a shorter runway, which would meet the stated objective of the project, the Reports consider less feasible and more environmentally damaging alternatives of an east-west runway, or extending the existing runway to the south – neither of which was mentioned in the 1997 update to the Master Plan.
- 3.12 c) The Oakland North Field is not included as an analyzed alternative. A tenant comment letter (Appendix D, page 22) indicates that they utilized the Oakland facility and therefore it is a likely, viable alternative.
- 3.13 d) Based on the limitations of Gness Field being located in numerous Hazardous Wildlife Attractant areas and given its location at sea-level on a flood plain and its susceptibility to future sea-level rise impacts (see below), a runway extension project might be better served at an alternative location. The Petaluma Municipal Airport, located only 10 minutes from Gness Field, is likely a better candidate for runway extension due to its existing condition and location. Its current runway length is 3,601 feet. The Reports did not consider extending the runway there to serve the very small percentage of planes that currently use Gness and occasionally take off with less than a full tank due to the 3,300 foot runway length – the project’s stated objective. The potential benefit derived from investing the proposed amount of money in the Petaluma facility would likely be greater to the regional community than any net benefit (considering all the limitations and wetland impacts) derived from the expansion of Gness Field. A true alternative analysis would consider this as an option.
- 14.3 6. Failure to consider the impact of Global Warming. The Reports are deficient for omitting the impact of impending climate disruption on the proposed project. Sea level rise is already expected to raise SF Bay Area waters at least several feet in coming decades, with even greater rising likely if global carbon emissions from human activities are not curbed or greatly reduced. Gness Field, at sea level, is especially vulnerable, and further investment in such a location is arguably unwise. Already documented sea level rise contributes to periodic flooding into parts of the airfield when major storms and high tides coincide.

Official projections by San Francisco Bay Conservation and Development Council (SFB CDC) and U.S. Geological Survey have documented the extent of expected SF Bay Area sea level rise

owing to climate change; 2009 scenarios range between 16 and 55 inches over the expected lifetime of proposed runway extension.

14.3 [http://www.bcdc.ca.gov/planning/climate\\_change/index\\_map.shtml](http://www.bcdc.ca.gov/planning/climate_change/index_map.shtml) More recent global projections of the onset of global warming indicate that these estimates are conservative and understated. The Reports ignore these data. Governor Brown’s 2011 conference on climate change and adaptation explored the anticipated scale of sea level rise and other impacts on the state such as increased frequency and intensity of storms. See <http://www.gov.ca.gov/ccref.php>. See also these additional materials that require the need to consider the impact of sea-level rise in the planning process. <http://www.scientificamerican.com/article.cfm?id=san-francisco-bay-area-enacts-sea-level-rise-policy>; <http://baykeeper.org/blog/bcdc-approves-amendment-bay-plan-addressing-sea-level-rise>. Impacts of global warming include the future need to build levees, larger dikes, and other engineered structures to protect Gness Field. These impacts are reasonably foreseeable and, therefore, must be considered in the EIR/EIS.

- 23.4 7. Need to Consider Adequately Prior Comments. We submitted letters to the FAA in August 2008 at the scoping stage, requesting that our environmental concerns be addressed in the draft Reports. Our letters, along with many other letters, were included in Appendix B – Public Involvement section of the draft Reports. But none of our concerns from our comment letters to the FAA were addressed in the draft Reports. We request that all the comment letters submitted in 2008 be reviewed and addressed in the Reports as required.

We respectfully request that you address the above issues before preparing the final draft of the EIR / EIS. Informed public comments and final decisions about the proposed project are not possible because of the deficiencies, missing data, and improper analysis that we have identified.

If you have any questions about this letter, please feel free to call us at 415-892-3620 or 415-209-9616.

Sincerely,

*Steven J. Nebb & Sharon L. Nebb*

Steven J. Nebb  
Sharon L. Nebb  
215 Saddle Wood Dr.  
Novato, CA 94945

*Christopher Gilkerson & Susan Mathews*

Christopher Gilkerson  
Susan Mathews  
220 Saddle Wood Dr.  
Novato, CA 94945



Grossman

## COMMENT FORM

### PUBLIC HEARING

GNOSS FIELD AIRPORT – Extend Runway 13/31  
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*  
ENVIRONMENTAL IMPACT REPORT  
January 10, 2012

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for GROSS Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

*I HAVE BEEN A PILOT SINCE 1964*

19.4  
EXTENDING THE RUNWAY GREATLY ADD TO  
SAFETY BECAUSE MOST ENGINE FAILURES OR  
~~ENGINE~~ ~~ENGINE~~ POWER PLANT FAILURES OCCUR  
DURING TAKE-OFF. IT IS MUCH BETTER  
TO IMMEDIATELY LAND ON THE UNUSED  
RUNWAY THAN LAND BEYOND IT  
ON A SURFACE THAT IS ROUGH AND  
DAMAGES THE AIRCRAFT OR, WORSE, IN WATER.

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835  
Fax: (650) 872-1430

FROM (Please Print):

Name: SAMPOD GROSSMAN

Address: 5 GOLDEN HEDGE

APT 208

SAN RAFAEL CA 94903

415-492-1030

1030







## Comments regarding flyovers, noise and lights at Gness Field, 2/6/2012

My name is Dr. Richard Levy. We live at 2516 Laguna Vista Drive in Novato which is just one air mile from the south end of the airport and on the highest ridge near the airport.

4.5 We have lived in the Bahia Ridge area for 14 years and literally made hundreds of phone calls to the airport when an airplane went over our home at a low height and was way off the corridor in which it was supposed to fly. These calls were mostly unanswered or when they were, we were told that the management of the airport would look into this. The flyovers continued, unabated.

Over the years I have become an old man and it is tiring and burdensome to continue making calls that have no beneficial outcome. And yes there are one or two pilots who continuously cut over our home in an effort to decrease flight time by one to two minutes. I cannot see well enough to read any numbers on the planes wings to report some of the infractions.

The Federal Government and the County of Marin have spent a lot of time and energy in trying to redesign the airport. What is missing is any enforcement of standards or policies to stop individuals from flying over our neighborhood.

Volume 2 of the DEIR spends a lot of explanation about Noise and how it will not affect surrounding neighborhoods. That may be true if the planes did not fly over our homes. The point is they do fly over our homes and there is no regulatory control or enforcement over them.

16.2 Our third and last point concerns airport lighting. The beacon lights from the airport do shine in our bedrooms despite what has been written in your proposal alternative B as well as in alternative A. What can you do to abate this nuisance and intrusion?

Thank you for your attention in addressing our concerns.

Petition and Comment Letter Regarding Gness Field Airport Proposed Extension of Runway  
and the Project's Draft Environmental Impact Report and Statement  
Signature Page (continued) - Signatures Collected After January 10, 2012

Signature: <i>Richard E. Levy</i>	Signature: <i>Rogelio Carr-Casanova</i>
Printed Name: Richard E. Levy	Printed Name: Rogelio Carr-Casanova
Street Address: 2516 Laguna Vista Drive	Street Address: 2516 Laguna Vista Drive
City, State, Zip Code: Novato, CA 94945	City, State, Zip Code: Novato, CA 94945
Email Address: drcl@comcast.net	Email Address: drcl@comcast.net

Signature:	Signature:
Printed Name:	Printed Name:
Street Address:	Street Address:
City, State, Zip Code:	City, State, Zip Code:
Email Address:	Email Address:

Signature:	Signature:
Printed Name:	Printed Name:
Street Address:	Street Address:
City, State, Zip Code:	City, State, Zip Code:
Email Address:	Email Address:

Signature:	Signature:
Printed Name:	Printed Name:
Street Address:	Street Address:
City, State, Zip Code:	City, State, Zip Code:
Email Address:	Email Address:



**COPY - Petition and Comment Letter Regarding Gross Field Airport Proposed Extension of Runway and the Project's Draft Environmental Impact Report and Statement Submitted at the January 10, 2012 Public Hearing**

Dear Supervisors Arnold, Adams, Kinsey, Sears, and Rice:

We are residents of the communities just south of Gross Field Airport. We petition you as the elected leaders of Marin County, the sponsor of the proposed project to extend the runway at Gross. We have significant concerns about the 1,100 foot length of the proposed runway extension. The longer 4,400 foot runway will enable larger jets to land at higher speeds, requiring a more direct landing angle to the south (over our homes), and at higher decibel levels.

Before we list our specific concerns and requests, we want to make clear that we are not against the airport or our local pilots who, by and large, try to avoid flying over our homes. In fact, we do not oppose 5 of the 6 elements of the proposed project necessary to make the airport safer. This includes extending the runway safety areas to 240 feet on each end, extending the taxiway to the full length of the runway, realigning or extending the drainage channels and levees, and reprogramming the navigational aids. We also would not oppose a shorter extension of the runway itself, with appropriate noise mitigation measures. However, extending the runway a full 1,100 feet will have a significant unavoidable noise impact on our homes and families and affect our quality of life.

Even with the existing 3,300 foot runway, the Draft EIR documents dozens of over-flights of our homes as part of the (we believe inadequate) noise disturbance monitoring study for the report. We can attest that this occurs on a frequent basis, despite the voluntary noise abatement guidelines the airport communicates to pilots. The over-flights occur at low altitude, just a few hundred feet above our roofs. The impact is jarring, creating a disturbance in our lives that can last long after the plane turns north for a landing. It disturbs children playing, babies sleeping, neighbors talking, and people trying to work in their yards or even inside their home offices. When a jet is "cutting the corner" over one of our homes to head to the runway, it seems dangerous. The impact and disturbance also affects our (and many other Marin County residents) use and enjoyment of the open space trails between our homes and the airport.

This noise disturbance is totally dismissed in the Draft Environmental Impact Report and Study ("EIR") through the use of bad data, unsubstantiated assumptions, and faulty logic. We respectfully ask you to:

• Consider, and direct the environmental consultant to consider, the alternative of a shorter runway extension, one that meets but does not exceed the basic requirements of Gross' current and proposed "B-1" general aviation airport classification. After consulting with pilots and aviation experts, we believe that, based on information in the Draft EIR itself and in the FAA's own mandatory Advisory Circular, the necessary runway length to meet the stated purpose of the project is only about 3,500 feet. It is not sufficient for the Draft EIR to claim summarily that "local conditions" require the extra 900 feet without more reasoned analysis.

• Consider, and direct the environmental consultant to consider, the impact of additional jets that will be able to takeoff at Gross if the runway is extended to 4,400 feet, with either a maximum or below maximum takeoff weight (which is how most planes fly anyway). The Draft EIR claims - without any substantiation - that the extra 1,100 feet of runway will not result in any additional or larger jets using Gross. This defies logic. In fact, the only two current airport users the Draft EIR notes as needing a runway extension are business jet owners. They themselves claim they want the extension to land bigger jets (including a Lear) at Gross. See Draft EIR, Appendix D, Attachment 1.

• Identify which "current airport tenants" are required to reduce fuel, passengers, or cargo as the result of the 3,300 foot runway, and how often. The Draft EIR states that only a very small percentage of the home fleet is jets. Nonetheless the report claims that the "existing 3,300 foot runway is insufficient to serve a majority of the airport's fleet mix under most conditions," and that 3,300 feet "severely limits most of the aircraft in the fleet." (Draft EIR at 2-2 and Appendix D.) If true, the report should document how many of the approximately 45,000 departures a year were limited in terms of takeoff weight, the type of jet, destination, and where the jet had to stop short to refuel. (The Draft EIR indicates this number may be as low as 3% of all takeoffs, and only on a few particularly hot days a year.) Because this is the County's stated purpose for needing the longer runway and spending tax dollars, and we understand it may be up to \$11,000,000, please show the public substantiation for these claims.

• Consider how the runway extension to 4,400 feet relates to or could facilitate the long-planned "Marin Jet Center" or other potential hangar and business developments at the airport. We are not anti-business, but the Draft EIR is completely silent about this possibility and does not consider those impacts. This seems disingenuous. Because we will be impacted by this project, we have a right to know who the proposed project will benefit and how.

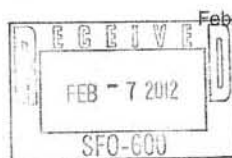
We think the above points properly must be considered in the Draft EIR under California (and Federal) law. But we petition you, as our elected officials and the sponsors of this project, to consider our concerns without regard to only what is necessary to meet bare minimum legal requirements. We ask that you be responsive in the spirit of good, transparent government. Thank you.

Very truly yours,

See Attached Signature Pages



Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835  
Fax: 650-827-1430



February 5, 2012

Re: EIR: Gness Field Airport – Proposed Extension of Runway 13/31.

Dear Mr. Pomeroy:

The referenced draft EIR is deficient for omitting the impact of impending climate disruption on the airfield's runways, expanded or not. Sea level rise is already expected to raise SF Bay Area waters at least several feet in coming decades, with even greater rising likely if global carbon emissions from human activities are not curbed or greatly reduced. Gness Field, at or very near sea level now, is especially vulnerable, and further investment in such a location is arguably unwise. Already documented sea level rise has arguably contributed to incursion of sporadic flooding into parts of the airfield when major storms and high tides, particularly king tides, coincide.

Official projections by San Francisco Bay Conservation and Development Council (SFBCDC) and U.S. Geological Survey have documented the extent of expected SF Bay Area sea level rise owing to climate change; 2009 scenarios range between 16 and 55 inches over the expected lifetime of proposed Gness Field infrastructure improvements.

[http://www.bcdc.ca.gov/planning/climate\\_change/index\\_map.shtml](http://www.bcdc.ca.gov/planning/climate_change/index_map.shtml) More recent global projections of the onset of global warming indicate that these estimates are conservative and understated. The DEIR ignores these data. Governor Brown's 2011 conference on climate change and adaptation explored the anticipate scale of sea level rise and other impacts on the state such as increased frequency and intensity of storms <http://www.gov.ca.gov/ecrcf.php>

Based on these projections, BCDC voted unanimously to propose a development ban on land within 100 feet of the coastline, giving the agency and local jurisdictions a tool to deny permits for development in coastal areas susceptible to flooding. <http://www.scientificamerican.com/article.cfm?id=san-francisco-bay-area-enacts-sea-level-rise-policy> Rising seas could put as much as 180,000 acres off-limits by 2050, according to state projections. Whether or not Gness Field lies within these limits, it is obviously acutely susceptible to flooding and sea level rise. SFBCDC has put Bay Area planners on notice about the need to take climate disruption and sea level rise into account in the planning process, but the DEIR ignores this cautionary notice. <http://baykeeper.org/blog/bcdc-approves-amendment-bay-plan-addressing-sea-level-rise>

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Moreover, expanding Gness Field's runway will confirm, promote and likely increase its use by commercial and corporate jet aircraft. Such aircraft are a significant source of carbon emissions, atmospheric carbon and hence contribute to on-going, increasingly severe climate disruption. Fostering more unmitigated development of this significant and increasing carbon source is inconsistent with climate protection and GHG-reduction plans at all levels, including Marin County's own efforts to shrink its carbon footprint. Carbon and other pollution from increasing jet traffic from expanded runways, or simply having more ordinary aircraft engines polluting local airspace and residences, will materially affect Novato's own climate-protection action plan for pollution reduction.

The DEIR should be revised to include consideration of these aspects of carbon-emission-caused climate disruption, present and future; the airport's vulnerability to such impacts; and the inadvisability of funding and building new infrastructure at this location.

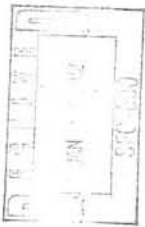
/s/ 

Edward A. Mainland  
1017 Bel Marin Keys Blvd.  
Novato, Ca 94949  
415-902-6365

14.3



mehrtten



January 22, 2012

Dear Mr. Pomeroy,

I am 100% in favor of the runway extension proposal for Gross Field in Novato.

Thank you,

*Rod Mehrtten*

Rod Mehrtten  
1165 Denlyn St.  
Novato, CA 94947

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Steven Nebb – Novato, CA 94945  
415-892-3620

## Introduction

- I have 5 years of experience in providing consulting services to the DOD and FAA
  - project planning and contract strategies,
  - contract negotiation support and
  - Analysis of highly technical engineering change orders in the implementation of various projects.
- I have reviewed the two environmental reports and have concerns about:
  - completeness of the analysis,
  - accuracy of important calculations and lack of support typically provided in similar analysis
- The issues I would like to highlight are:
  - 3.2 [– True alternatives not addressed (smaller expansion)
  - 20.9 [– The lack of mandatory FAA procedures (AC 150/5325-4B)
  - 20.9 [– Miscalculations of runway length and lack of support for various assumptions
  - 2.1 [– The impact of the extension on fleet mix and usage

IWEBO

## Project Purpose and Needs

- 2.1 [
  - According to the county Master Plan, Gross' airport reference code (ARC) is B-I (apx. D page 3); planes that approach at 91 to 121 knots w/ wingspan less than 49'
    - Objective of the project is to make field compliant with B-I status - 12, 500 lbs.
    - IMPORTANT; limited to B-I planes lowers length, letters of users to buy bigger planes
  - Lack of Data
    - 20.8 [– The Cessna CJ1+ (525) is the critical aircraft (not supported with actual data) (apx. D page 3)
      - Analysis typically using critical design aircraft have supporting data, if not the rely on FAA advisor circular
    - 1.3 [– Approximately 3% or 3,000 flights out of 95,000 are weight restricted (page 2-2 of the EIS)
      - Not necessarily from B-I planes by may include larger planes
      - Weight is an issue for the 525 at the current runway length for temperatures above 78 degrees – 8% of the year *X. Zofsch@Sillows 5% = < 1/2 %*
      - Impact on less than 1% of Marin County residents
  - 1.7 [• With 3,300' no weight restriction for critical aircraft during standard days (apx. D page 15); landing is not an issue either (apx. D page 11) –
    - For the CJ1+ during hot days planes are restricted by about 680 nm Per Table 8 (apx. D page 16) vs. 776 nm per flight manual; can service entire west coast
    - Average Southwest flight apx. 640 nm



# Problems with EIR

- Error in length of runway needed

1. Statement that "based on standard FAA methodology ... length of approximately 4,000 feet" on page 10 of appendix D is incorrect.

20.9 [ - FAA Advisory Circular (AC) 150/5325-4B - "Runway Length Requirements for Airport Design" is not even considered

3.3 [ - AC would estimate a 3,500' runway length to accommodate "100 Percent of Fleet"

20.9 [ - May use airplane flight manuals, but there is no requirement to go beyond AC (page 5 of the AC); Analysis using critical design aircraft are typically done for analysis involving planes greater than 60,000 lbs. or 10 seat+ planes (B-I planes have less) since the circular directs the planner to use the family of planes represented by the graphs provided in the circular document

20.9 [ - For airport projects receiving Federal funding, the use of this AC is mandatory. David L. Bennett Director, Office of Airport Safety and Standards

20.10 [ 2. Use of larger (B-II) planes in the analysis; 525A and 525B are B-II planes - EIR is in error and classifies these as B-I

20.8 [ 3. Calculation error off by more than 200 feet since the reported figure for the Cessna 525 is for 86 degrees not 82 degrees; 525 - 3,786' vs. 3,990'

20.12 [ 4. Abnormal day which is used to argue for adding 400 more feet, is not defined (and likely negatively correlated with hot days)

3.2 [ 20.12a To remain within the objectives of the County Master Plan of a filed that services B-I type planes under 12,500lbs. The true alternative of a lesser extension was not appropriately addressed in the reports

## Louder and Larger planes

- With 4,400' the following planes could effectively use the facility

3.5 [ - B-I; BeechJet 400A - *Heavier*

- B-II; Cessna 525A, 525B, Citation II, Encore, XLS, V Ultra - *Larger*

- C-I; LearJet 23, 24F, 25D, 31A, 40, 45 - *Faster & Louder*

- C-II; Sabreliner 80 (60 - C-I)

- Decibels (approach) FAR 36 noise levels

4.17 [ - C525 (CJ+) 82 dBA - *Louder & More disturbance than Take Off*

- BeechJet dBA 91 dBA

- LearJets 90-100 dBA

- Sabreliner 95 dBA



Feb 4, 2012 Pack  
Robert Pack  
2511 LAOUNA VISTA  
NORWALK CA 94945

Dear Mr. Pomeroy

Re: GROSS Dear Sir

Appendix D, page 10 HAS A SERIOUS ERROR IN STATING "---- 3300 ft severely limits most of the aircraft in the fleet departing the airport during STANDARD AND HOT DAYS ----".

THIS IS FALSE.

99% OF THE AIRCRAFT OPERATING OUT OF GROSS ARE NOT LIMITED AT ALL, AT ANY TIMES, DUE TO RUNWAY LENGTH OF 3300 FT. NINETY NINE PERCENT!

THE ONLY AIRCRAFT AFFECTED ARE THE JETS (IE CS10, CS25). THE AIRPLANES MAKE UP ONLY 1% (ONE PERCENT!) OF THE AIRCRAFT BASED AT GROSS.

ALL OTHER AIRCRAFT (EVERY AIRPLANE WITH A PROPELLER) IS NOT LIMITED BY 3300 FT UNDER ANY CONDITION (IE HOT DAY).

THE INCREASE TO 4400 FT. WILL ALLOW MANY MORE TYPES OF JET AIRCRAFT TO USE GROSS. THERE ARE ABOUT 90 DIFFERENT MODELS OF BUSINESS JETS, ONLY A HANDFUL CAN USE GROSS NOW. THE INCREASE IN JETS AT GROSS SHOULD BE UNACCEPTABLE TO THE FAA BECAUSE THE FAA'S OWN STUDIES SHOW THE MOST DANGEROUS SITUATION IS A MIX OF JETS AND GENERAL AVIATION AIRCRAFT AT AN "UNCONTROLLED" (IE NO CONTROL TOWER) AIRPORT. GROSS HAS NO

control tower.

19.5 [ THE FAA KNOWS THE RISK OF AIRCRAFT COLLISIONS GOES TO MAXIMUM WHEN JETS AND GENERAL AVIATION OPERATE IN UNCONTROLLED AIRPORTS.

THE RUNWAY SHOULD NOT BE LENGTHENED TO 4400' BECAUSE

1.3 [ 1) IT BENEFITS ONLY ONE PERCENT OF THE AIRCRAFT OPERATION AT GROSS.

20.7 [ 2) GROSS IS PRIMARILY USED AS A STUDENT TRAINING AIRPORT (INSTRUCTORS BRING STUDENTS TO GROSS FROM ALL OVER THE AREA DUE TO ITS CROSS WINDS)

19.6 [ 3) SLOW GA AND TRAINING AIRCRAFT ARE NOT COMPATIBLE WITH JETS IN AN AIRPORT ENVIRONMENT. THE SAFETY OF 99% OF THE AIRCRAFT IS COMPROMISED FOR A MARGINAL BENEFIT TO THE 1%.

1.3 [ 4) THE 1% OF THE AIRCRAFT THAT WILL BENEFIT WILL BENEFIT ONLY A SMALL FRACTION OF THE TIME (MAYBE 5%)

1.4 [ 5) WHEN I FLEW FOR UNITED AIRLINES, WE OPERATED FROM MANY AIRPORTS THAT HAD LENGTH LIMITING OUR TAKE-OFF WEIGHT UNDER SOME CONDITIONS. YET WE JUST WERE OPERATING.

3.11 [ PS PUT IN THE OVER-RUN.

Robert Pack



Roell

**COMMENT FORM****PUBLIC HEARING**

**GNOSS FIELD AIRPORT – Extend Runway 13/31  
ENVIRONMENTAL IMPACT STATEMENT and concurrent  
ENVIRONMENTAL IMPACT REPORT  
January 10, 2012**

Welcome to the Public Hearing for the Environmental Impact Statement and concurrent Environmental Impact Report for Gness Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

I am a former military aviator & a Mill Valley resident who keeps a small private aircraft @ Gness. My family & I use our aircraft for both business & pleasure.

20.4 Approval of the runway extension project will allow me to operate my aircraft at its maximum (most efficient) range while reducing noise levels to the southern neighbors of the airfield by displacing Gness operations to the north.

4.9 Furthermore, the proposed change would provide an additional measure of safety for my wife & four six year olds who routinely fly with me.

19.4 Submit comments postmarked by February 6, 2012 to:

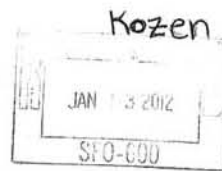
Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835  
Fax: (650) 872-1430

**FROM (Please Print):**

Name: Charles Roell  
Address: 33 Birch St  
Mill Valley CA 94941



Barbara Rozen  
10 J. Prandi Way, #1003  
San Rafael, CA 94903



January 7, 2012

Doug Pomeroy  
FAA  
San Francisco Airports District Office  
1000 Marina Blvd. Suite 200  
Brisbane Ca 94005

Dear Mr. Pomeroy,

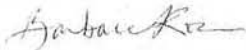
13.18 [ This is re: the proposed expansion of the Gness Field. I am concerned about the loss of wetlands and  
also that low flying planes disturb the migratory birds that over winter at the ponds adjacent to the  
airfield.

12.4 [ If the expansion is approved can the pilots be advised to fly in and out on a path that avoids flying  
directly over the ponds? We are running out of protected areas where these birds can rest and thrive.

10.3 [ Rush Creek is a popular multi-use path and noise from low flying planes is disturbing to both humans  
and animals.

Thank you for your consideration of these issues.

Barbara Rozen



CC: Marin County Board of Supervisors

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# Silveira Ranches

Anthony F. and Lorraine F. Silveira 2002 Trust  
dba SILVEIRA RANCHES  
140 Blackstone Drive  
San Rafael, CA 94903

Feb 3, 2012

Mr. Doug Pomeroy  
FAA San Francisco Airports District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, California 94005-1835  
Sent by Certified Mail and by Fax (650) 872-1430

RE: Impacts of the Gnosss Field Airport Runway Extension on Silveira Ranch Private Property

Dear Mr. Pomeroy,

We are responding to the Draft EIS/EIR for the Proposed Extension of Runway 13/31 at Gnosss Field Airport, Marin County, California.

We own property flanking the 101 Highway north of Novato for several miles. Our most southerly parcels (APNs 125-160-06 and 125-160-12) are bordered on the east by the SMART railroad track, placing them relatively close to the proposed northerly extension of the airport runway.

We are concerned that significant potential environmental impacts to our property have not been adequately addressed and/or mitigated in the Draft EIS/EIR.

We are particularly disturbed by Exhibits E-8 (INM Flight Tracks - Arrivals) and E-9 (INM Flight Tracks - Departures & Training). Copies of these exhibits are attached. They show a significant concentration of low-elevation flight tracks over our property (parcels 125-160-06 and 125-160-12).

These parcels are used as grazing land for our livestock - meaning that animals are present 24/7 on the property for extended periods of time. (In the future, when some of our land further north is taken by Caltrans for the Marin-Sonoma Narrows project, we will be relying more heavily on these southern parcels.) Cows are easily frightened by dramatic changes in sound or movement; their reaction is to run. The outcome could be devastating from a public

Response from Silveira Ranches re Gnosss Field Airport Runway Extension Draft EIR/EIS (2 pages attached)

health and safety standpoint if they were to break the pasture fence along Highway 101 and escape onto the roadway. The proposed overflights may also have adverse impacts on the health, well-being and productivity of our dairy herd. This is another potential environmental impact of the Gnosss Field project which is not adequately addressed in the Draft EIS/EIR.

It appears that the Draft EIS/EIR does not consider the impacts on our livestock with the increased flight tracks over our pasture. It is apparent that flights will be more frequent (due to the projected increase in airport usage by larger aircraft, including noise emanating from new small jet traffic) than what the animals are presently accustomed to.

Finally, parcels 125-160-06 and 125-160-12 are zoned A2 and can be developed for other, non-grazing uses at some future date. The Draft EIS/EIR also does not adequately evaluate the potential negative impacts of the proposed runway expansion under a future development scenario.

Very truly yours,

*Anthony F. Silveira*

Anthony F. Silveira

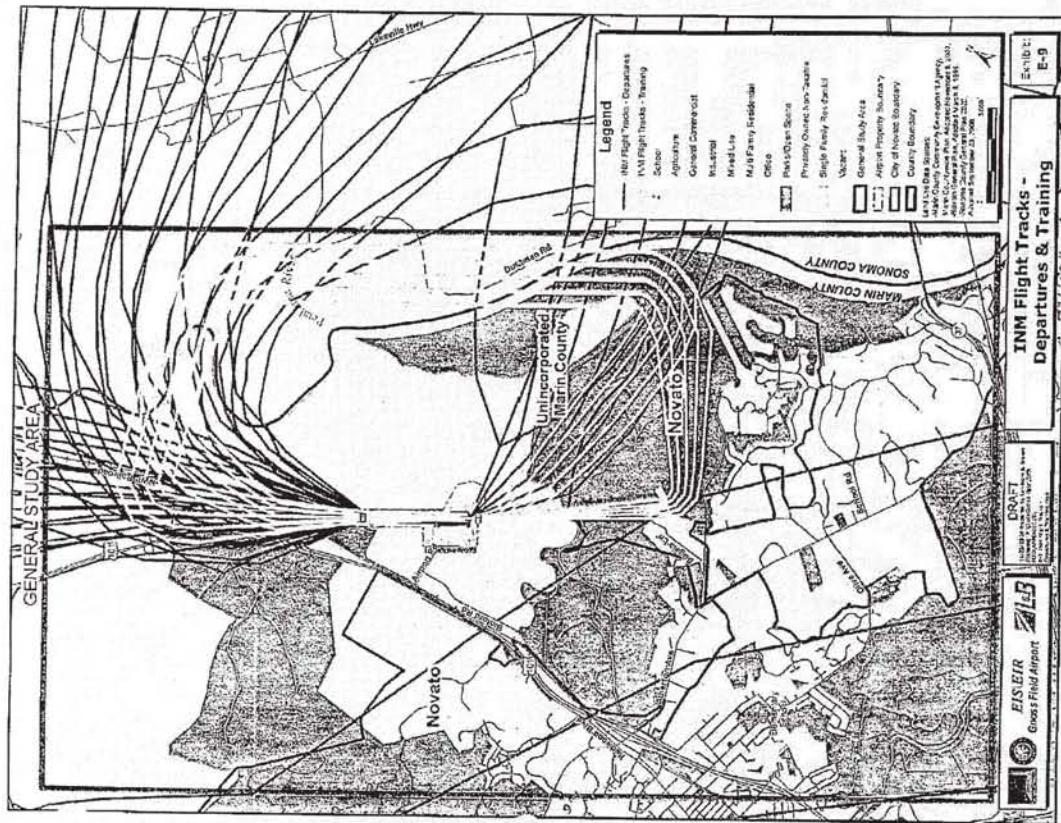
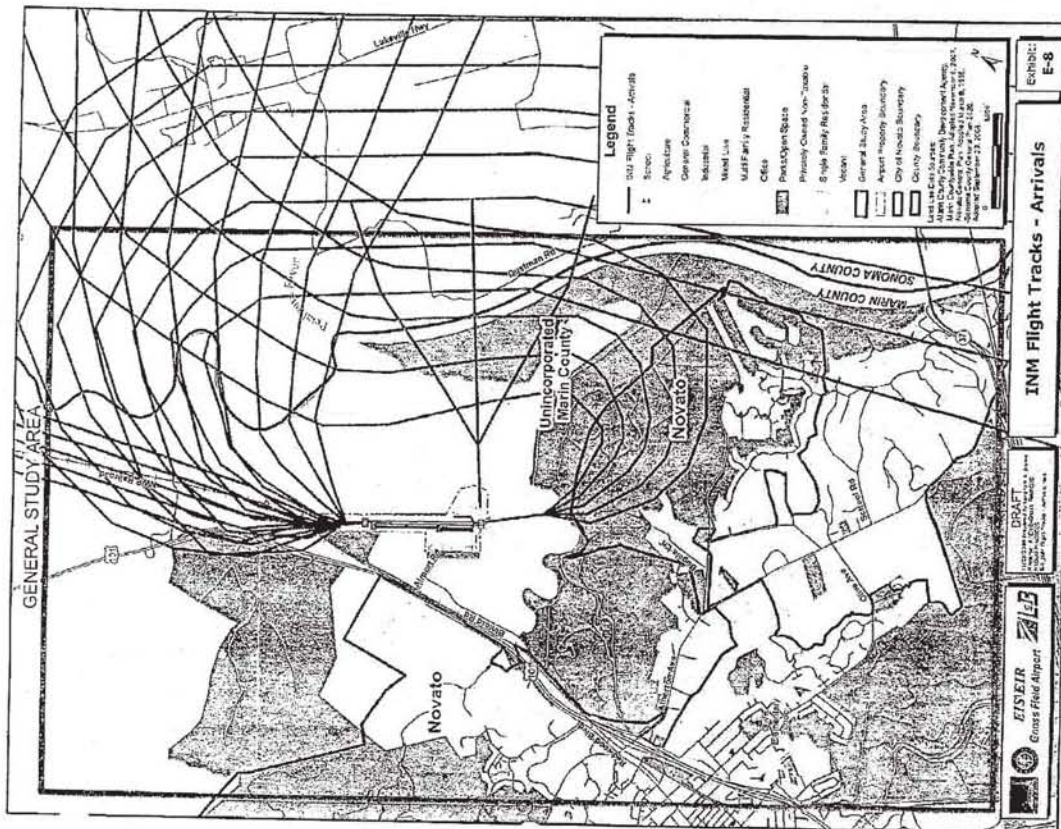
*Lorraine F. Silveira*

Lorraine F. Silveira

Please note that our last name is misspelled in the distribution listing on Page 7-19 of Chapter 7 of the EIS: the correct spelling is "Silveira" (not Silvera). The complete name of the trust is "Anthony F. Silveira and Lorraine F. Silveira 2002 Trust."

Response from Silveira Ranches re Gnosss Field Airport Runway Extension Draft EIR/EIS (2 pages attached)







February 6, 2012

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

Fax: (650) 872-1430

By Fax and US Mail

RE: Gross Field Airport - Proposed Extension of Runway 13/31

Dear Mr. Pomeroy:

We are residents of the Rush Creek community just south of Gross Field Airport. This is a comment letter, based on a petition signed by over 100 residents of Marin County that was sent to the Marin County Board of Supervisors, the sponsor of the proposed project to extend the runway at Gross. We have significant concerns about the 1,100 foot length of the proposed runway extension. The longer 4,400 foot runway will enable larger jets to land at higher speeds, requiring a more direct landing angle from the south (over our homes), and at higher decibel levels. The draft EIR/EIS fails to consider this.

Before we list our specific concerns and requests, we want to make clear that we are not against the airport or our local pilots who, by and large, try to avoid flying over our homes. In fact, we do not oppose 5 of the 6 elements of the proposed project necessary to make the airport safer. This includes extending the runway safety areas to 240 feet on each end, extending the taxiway to the full length of the runway, realigning or extending the drainage channels and levees, and reprogramming the navigational aids. We also would not oppose a shorter extension of the runway itself, with appropriate noise mitigation measures. However, extending the runway a full 1,100 feet will have a significant unavoidable noise impact on our homes and families and affect our quality of life.

Even with the existing 3,300 foot runway, the Draft EIR documents dozens of over-flights of our homes as part of the (we believe inadequate) noise disturbance monitoring study for the report. We can attest that this occurs on a frequent basis, despite the voluntary noise abatement guidelines the airport communicates to pilots. The over-flights occur at low altitude, just a few hundred feet above our roofs. The impact is jarring, creating a disturbance in our lives that can last long after the plane turns north for a landing. It disturbs children playing, babies sleeping, neighbors talking, and people trying to work in their yards or even inside their homes offices. When a jet is "cutting the corner" over one of our homes to head to the runway, it seems dangerous. The impact and disturbance also affects our (and many other Marin County residents) use and enjoyment of the open space trails between our homes and the airport.

This noise disturbance is totally dismissed in the Draft Environmental Impact Report and Study ("EIR") through the use of bad data, unsubstantiated assumptions, and faulty logic. Under both federal requirements and the California Environmental Quality Act, the EIR/EIS are required to:

- Consider the alternative of a shorter runway extension, one that meets but does not exceed the basic requirements of Gross' current and proposed "B-1" general aviation airport classification. After consulting with pilots and aviation experts, we believe that, based on information in the Draft EIR itself and in the FAA's own mandatory Advisory Circular, the necessary runway length to meet the stated purpose of the project is only about 3,500 feet. It is not sufficient for

the Draft EIR to claim summarily that "local conditions" require the extra 900 feet without more reasoned analysis.

- Consider the impact of additional jets that will be able to takeoff at Gross if the runway is extended to 4,400 feet, with either a maximum or below maximum takeoff weight (which is how most planes fly anyway). The Draft EIR claims - without any substantiation - that the extra 1,100 feet of runway will not result in any additional or larger jets using Gross. This defies logic. In fact, the only two current airport users the Draft EIR notes as needing a runway extension are business jet owners. They themselves claim they want the extension to land bigger jets (including a Lear) at Gross. See Draft EIR, Appendix D, Attachment 1.

- Identify which "current airport tenants" are required to reduce fuel, passengers, or cargo as the result of the 3,300 foot runway, and how often. The Draft EIR states that only a very small percentage of the home fleet is jets. Nonetheless the report claims that the "existing 3,300 foot runway is insufficient to serve a majority of the airport's fleet mix under most conditions," and that 3,300 feet "severely limits most of the aircraft in the fleet." (Draft EIR at 2-2 and Appendix D.) If true, the report should document how many of the approximately 45,000 departures a year were limited in terms of takeoff weight, the type of jet, destination, and where the jet had to stop short to refuel. (The Draft EIR indicates this number may be as low as 3% of all takeoffs, and only on a few particularly hot days a year.) Because this is the County's stated purpose for needing the longer runway and spending tax dollars, and we understand it may be up to \$11,000,000, please show the public substantiation for these claims.

- Consider how the runway extension to 4,400 feet relates to or could facilitate the long-planned "Marin Jet Center" or other potential hangar and business developments at the airport. We are not anti-business, but the Draft EIR is completely silent about this possibility and does not consider those impacts. This seems disingenuous. Because we will be impacted by this project, we have a right to know who the proposed project will benefit and how.

The above points properly must be considered in the EIR/EIS under California (and Federal) law.

Very truly yours,

*Leslie Weber*  
Leslie Weber  
183 Saddle Wood Dr.  
Novato, CA 94945

*Duncan and Betsy Ross*  
Duncan and Betsy Ross  
190 Saddle Wood Dr.  
Novato, CA 94945

*Leslie Weber*  
Leslie Weber  
235 Saddle Wood Dr.  
Novato, CA 94945



Weber

Leslie & Chris Weber  
235 Saddle Wood Drive  
Novato, CA 94945  
(415) 892-9232



February 6, 2012

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835

RE: Gross Field Airport

Dear Mr. Pomeroy:

We are residents of Rush Creek, just south of Gross Field. We are submitting this letter to raise questions and concerns about the draft Environmental Impact Statement and concurrent Environmental Impact Report (the "Reports") as prepared by Landrum and Brown, December 2011.

After carefully reviewing the reports we have several concerns relating to the completeness and accuracy of the analyses.

According to the Reports, the type of plane suitable for Gross Field is a B-1, small aircraft with a maximum take-off weight of 12,500 pounds, up to 49 foot wingspan, and approach speed of 91 to 121 knots. The objective of the project is to make the airport fully compliant for B-1 airplanes under all weather conditions.

The Reports attempt to substantiate the 4,400 feet of runway length as a need to support the deemed Critical Design Plane. The 4,400 feet extension is based on an objective that is not congruent with the current Sponsor's objective and, as indicated in the 1989 Airport Master Plan was for planes with 10 seats or more. The CJI+ aircraft is not in this category. If the CJI+ is the critical design aircraft, the starting point should have been the lower range of 3,800 feet as stated in the 1989 Airport Master Plan.

The 4,400 feet extension would be applicable for 10 passenger aircraft. However, no 10 passenger aircraft meets the objectives of the current project objectives of being a small aircraft with a maximum take-off weight of 12,500 pounds or less, nor is the critical design aircraft designed for 10 passengers. Therefore, an alternative using a shorter runway extension should have been considered and it was not.

The Reports only address alternatives that consider a total runway length of 4,400 feet or the current 3,300 feet. An alternative of 3,500 or even 3,600 feet should be considered in the Reports.

The draft Reports do not provide any analyses on how the fleet mix and usage would change as a result of the 1,100 foot extension. The Reports state that larger aircraft would not be attracted to the airport and therefore there would be no change in the fleet mix or the usage of the airport (page 2-5).

This defines logic. If the runway is lengthened by 1,100 feet, larger non-B-1 airplanes could use the airport. Furthermore the draft Reports provide letters confirming that current tenants at Gross Field (Appendix D, pages 21-25) would purchase and operate larger jets at Gross Field if the runway was lengthened to 4,400 feet. Sunset Aviation states that they would add a Beech Jet 400 (B-1 with a maximum take-off weight of 16,100 lbs.) and a Learjet (most are C-1 up to D-1 airplanes) to Gross Field if the runway was extended to 4,400 feet. None of these aircraft meet the specifications of the proposed project. All of them are larger and louder airplanes. Airport users have stated that they could use the larger airplanes, thus changing the volume and mix of the fleet at Gross Field.

The 1989 Airport Master Plan states that a 1,100 foot extension is desired to more adequately satisfy requirements for aircraft with 10 seats or more used in air taxi and commercial operations. (page 4-16).

This further supports the case that the fleet mix and usage would change as a result of the 1,100 foot extension.

The current analysis of noise level and environmental impact is inadequate. It fails to consider the impact of the larger jet usage once the runway is extended. The purpose of the analysis should be to try and determine the worst case scenario so that any noise level disturbances can be appropriately mitigated. Since two current airport users state that they will purchase and use larger airplanes at Gross Field with a longer runway, a proper noise analysis must be done.

We submitted a letter to the FAA, in August, 2008, requesting that our environmental concerns be addressed in the draft Reports. Our letter, along with many other letters, were included in Appendix B - Public Involvement section of the draft Reports. None of our concerns from our comment letter to the FAA were addressed in the draft Reports. We request that all the comment letters submitted in 2008 be reviewed and addressed in the Reports as required.

As a homeowner we are very concerned about the possible noise impact due to larger planes using the airport. Already, there are times when the airplanes fly right overhead and you can hear and feel the plane for quite sometime. As stated above, we don't believe the potential for larger planes to use Gross Field has been properly addressed, and we have every reason to believe we will be negatively impacted by the increase in the runway length.

We appreciate your prompt attention to our concerns and look forward to hearing from you. If you have any questions or concerns you would like to address with us, please feel free to call us at 415-892-9232.

Sincerely,

Leslie & Chris Weber



Wells

## COMMENT FORM

### PUBLIC HEARING

**GNOSS FIELD AIRPORT – Extend Runway 13/31  
ENVIRONMENTAL IMPACT STATEMENT *and concurrent*  
ENVIRONMENTAL IMPACT REPORT  
January 10, 2012**

Welcome to the Public Hearing for the Environmental Impact Statement *and concurrent* Environmental Impact Report for Gness Field Airport. Public comments are an integral part of the process. This comment form is provided to receive your input and ensure that your concerns are considered. Please use this form to submit written comments, attaching additional pages if necessary. Either place the form in the comment box, provided here at the meeting, or mail to the address below, by February 6, 2012.

Joyce Wells <jflys@earthlink.net>  
Gness Field runway extension  
January 12, 2012 3:20:46 PM PST  
opinion@marinij.com  
cc: To Doug Pomeroy - FARA

19.4  
The current Gness Field has been there since 1968 when there were no home developments South of the field. I learned to fly there in 1968 and am still at it. As I see it, one of the biggest safety issues for the majority of airplanes flying in and out of Gness is the CROSSWINDS that frequently occur and was only briefly mentioned Wednesday. Granted, they probably do not have an environmental impact, but can be a cause for accidents. Extending the runway to the North lessens the severity of the crosswinds, improving safety of take offs and landings, as well as mitigating noise. The homeowners to the South must also realize that aircraft from other parts of the Bay Area may fly low over the area sightseeing and are never in contact with Gness.  
Joyce Wells 924-2658  
Larkspur

*Joyce Wells*  
1/19/12

Submit comments postmarked by February 6, 2012 to:

Mr. Doug Pomeroy  
Federal Aviation Administration  
San Francisco Airport District Office  
1000 Marina Boulevard, Suite 220  
Brisbane, CA 94005-1835  
Fax: (650) 872-1430

FROM (Please Print):

Name:

Address:



Ms. Joyce B. Wells  
21 La Rosa Way  
Larkspur, CA 94939-2072



BEFORE THE  
MARIN COUNTY BOARD OF SUPERVISORS

Joint Public Hearing with the Federal Aviation Administration  
on Draft EIS and EIR for Gness Field Runway Expansion

MARIN COUNTY CIVIC CENTER  
BOARD OF SUPERVISORS CHAMBER  
3501 CIVIC CENTER DRIVE  
SAN RAFAEL, CALIFORNIA

TUESDAY, JANUARY 10 2012  
1:30 P.M.

Reported by:  
Michael Connolly

**BOARD OF SUPERVISORS**

Steve Kinsey, Presiding  
Judy Arnold  
Kathrin Sears  
Katie Rice  
Susan Adams (absent)

**FEDERAL AVIATION ADMINISTRATION**

Douglas Pomeroy, Environmental Protection Specialist

**LANDRUM AND BROWN**

Rob Adams  
Craig Tackabery  
John Roberto

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## P R O C E E D I N G S

1

2 JANUARY 10, 2012

2:00 P.M.

3 SUPERVISOR KINSEY: Good afternoon. Our Board of  
 4 Supervisors is reconvening in open session. We did address  
 5 three issues in closed session but we have no reportable  
 6 items.

7 At this point we are going to take up the matter of  
 8 the public hearing by the Board of Supervisors and the  
 9 Federal Aviation Administration as it relates to the Draft  
 10 Environmental Impact Report and the Draft Environmental  
 11 Impact Statement for the Gness Field proposed 13/31 runway  
 12 extension. This will be a joint public hearing between our  
 13 two agencies and we will open our public hearing on the  
 14 Draft EIR and there will also be an opportunity for the FAA  
 15 representative, Mr. Pomeroy, to open the public hearing for  
 16 the Draft EIS.

17 We will receive the staff report that will benefit  
 18 all of us and then we will take public comments. And each  
 19 of our respective agencies will then close the public  
 20 hearing and give our staff directions to prepare final  
 21 environmental documents. The FAA will prepare a final  
 22 Environmental Impact Statement under their protocols,  
 23 including written responses to both the oral and the written  
 24 comments that are received during the public comment period  
 25 and all written responses received during the public review

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1 period.

2 I'm going to mention that we will keep speaker's  
3 comments to three minutes, although we have made  
4 arrangements for a group of aviation representatives who  
5 have brought several persons to speak to consolidate into  
6 one speaker, and that is Mr. Knecht, for five minutes. When  
7 that opportunity comes he will be able to speak for five  
8 minutes. Three minutes for other speakers. And with that  
9 I'm going to ask Mr. Pomeroy if he would like to make any  
10 opening comments. Welcome.

11 MR. POMEROY: Yes, thank you for hosting this joint  
12 hearing today. The Federal Aviation Administration  
13 appreciates being able to do this in a joint format, both  
14 for you and for the public. I just have one brief statement  
15 on the commenting style for the FAA, so pardon me while I  
16 read this from our guidance documents. But it really does  
17 help if you're able to follow this commenting style.

18 The FAA encourages all interested parties to provide  
19 comments concerning the scope and content of the Draft EIS.  
20 The comments should be as specific as possible and address  
21 the analysis of potential environmental impacts and the  
22 adequacy for the proposed action or merits of its  
23 alternatives and the mitigation being considered. Reviewers  
24 should organize their participation so that it is meaningful  
25 and makes the agency aware of the viewer's interest and

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1 concerns using quotations and other specific references to  
2 the text of the Draft EIS and related documents. Matters  
3 that could have been raised with specificity during the  
4 comment period on the draft EIS may not be considered if  
5 they are raised for the first time later in the decision  
6 process. This commenting period is intended to ensure that  
7 substantive comments and concerns are made available to the  
8 FAA in a timely manner so that the FAA has an opportunity to  
9 address them.

10 Thanks for bearing with me reading that.

11 SUPERVISOR KINSEY: Thank you. The speaker cards  
12 are available. If you haven't filled out a speaker card,  
13 they are available, is that correct?

14 MR. POMEROY: Yes, just turn them into me.

15 SUPERVISOR KINSEY: Very good. And then we will  
16 take them in the order in which we receive them. At this  
17 point I think that we are going to receive our staff report  
18 on the expansion of the runway at Gness Field.

19 MR. TACKABERY: Good afternoon, President Kinsey,  
20 Members of the Board and Mr. Pomeroy. I'm Craig Tackabery,  
21 Assistant Director of Public Works. I'm pleased to be here  
22 before you today. It's not often we discuss Gness Field at  
23 meetings of this type, even though it's been Marin County's  
24 airport for 50 years.

25 The county's interest is in maintaining an

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1 economically sustainable operation at the airport and the  
 2 airport currently operates with a balanced budget, although  
 3 there are some areas of deferred maintenance that need to  
 4 eventually be addressed. From time to time the airport  
 5 needs to undertake projects to retain current business  
 6 tenants and users and to attract new tenants and users to  
 7 remain economically sustainable. The airport serves as an  
 8 important link in the regional transportation network by  
 9 providing air travel options for residents and businesses.  
 10 Extension of the runway has been contemplated in the 1989  
 11 airport master plan and the 1997 update. Also included are  
 12 proposed runway safety area improvements to improve safety  
 13 at the airport and comply with current FAA standards.

14 Today's meeting is regarding the Draft EIR and EIS.  
 15 This work was funded through a grant from the Federal  
 16 Aviation Administration and the FAA takes the lead in  
 17 managing most of the process and they have selected Landrum  
 18 & Brown to prepare the documents for you today. With me  
 19 today is Rob Adams from Landrum & Brown and Sarah Potter and  
 20 also our consultant on the county side, John Roberto. And  
 21 at this time Rob is going use a PowerPoint to give you an  
 22 overview of the project.

23 SUPERVISOR KINSEY: Thank you. Rob?

24 MR. ADAMS: Do you want to dim the lights to make it  
 25 a little easier to see? Thank you. Okay, so as Craig

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1 mentioned, we have two organizations here and two processes  
 2 that are occurring. The first is with the County of Marin  
 3 and there is the preparation of the Environmental Impact  
 4 Report, which satisfies the state environmental requirements  
 5 or CEQA. The county is the sponsor of the project as well  
 6 as in terms of the CEQA sponsor as well. The Federal  
 7 Aviation Administration are leading the Environmental Impact  
 8 Statement, which is dealing with federal environmental  
 9 guidelines and we refer to that as NEPA, those are the  
 10 federal guidelines.

11 As Craig mentioned, Landrum & Brown who I represent,  
 12 we were hired by the FAA to prepare the EIS and also by the  
 13 county to prepare the Environmental Impact Report. We have  
 14 been able to run these two different studies along virtually  
 15 the same process, though deferring to each process where we  
 16 have needed to. And you can see some of the highlights  
 17 here. I'm not going to go through each one of these for you  
 18 but we were able to at the same time issue a Notice of  
 19 Intent for the NEPA process as well as a Notice of  
 20 Preparation to satisfy to satisfy the CEQA process. We held  
 21 a joint scoping meeting for both processes, both of those  
 22 occurred back in 2008. And then we are here today holding a  
 23 joint public hearing for both processes.

24 Once we get past this step in the process things  
 25 will start to diverge a little more. And, you know, as you

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1 are aware after this meeting today then a final EIR will be  
 2 prepared. That will be circulated, made available, there  
 3 will be another hearing that is specific to the project  
 4 itself, and then the certification step will occur. So the  
 5 purpose of the public hearing today is really to receive  
 6 public comments on the adequacy and the completeness of both  
 7 the Draft EIS as well as the Draft EIR.

8       So let's get more familiar with the airport. There  
 9 is one runway at Gness Field, it's 3300 feet in length.  
 10 There are roughly 95,000 takeoffs and landings that occur at  
 11 the airport each year. Most of the aircraft takeoff towards  
 12 the north and land from the north and that is done to avoid  
 13 the residential areas that are located to the south of the  
 14 airport. There is a system of levees that are around the  
 15 airport, one of which is very close to the airport and then  
 16 there are others east of the airport. Their primary  
 17 function is to protect the airport and the runway from  
 18 flooding issues from the Petaluma River and the basin area  
 19 there.

20       The county identified one primary need for the  
 21 airport in conducting this study and that was for sufficient  
 22 runway length. The existing runway at 3300 feet limits the  
 23 ability of some of the aircraft to operate at what we would  
 24 call their optimum weight or to get their maximum  
 25 efficiency. That requires pilots to restrict weight when

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1 they takeoff and how they do that is either they reduce fuel  
 2 or they reduce passengers or cargo on the aircraft. So from  
 3 an efficiency standpoint that requires either bringing in  
 4 multiple aircraft or they may have to make multiple trips to  
 5 accommodate and fulfill the trip that they would like to  
 6 have. So with that the county then identified the proposed  
 7 project.

8       And I'm going to flip to the next slide just so you  
 9 can see it graphically, it's probably a little bit easier  
 10 than seeing it on the text. The primary element is the  
 11 extension of the runway to the north 1100 feet. It would  
 12 bring the total length of the runway to 4400 feet. There  
 13 also would be a taxiway extension that would occur to  
 14 accommodate aircraft moving to the end of the runway as well  
 15 as extending the existing levee and drainage ditch system  
 16 that are currently around the end of the runway, those would  
 17 also have to be relocated and extended. What is not shown  
 18 on this exhibit here is there are navigational aids out  
 19 there which help aircraft land on the airport, it's a  
 20 lighting system. Those would have to be relocated and  
 21 reprogrammed as part of the process as well. And then  
 22 finally, off of each of the ends of the runway there would  
 23 be an extension and a widening of what is called the runway  
 24 safety areas. And these are just protective areas in case  
 25 an aircraft were to roll off the end of the runway, those

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1 would be expanded from the current length today.

2 We considered a number of alternatives to date as we  
3 prepared the draft studies, one of which is shown on here,  
4 which we call Alternative A, which is the no action. This  
5 essentially is that we leave the airport exactly as it is  
6 today. We also have an Alternative B, which is the proposed  
7 project. And, again, that's an extension of the runway 1100  
8 feet to the north. We had an Alternative D, which also  
9 extended the runway by 1100 feet but it accomplished this by  
10 splitting that extension 860 feet to the north and 240 feet  
11 to the south. These three alternatives, A, B and D, were  
12 carried forward in the Environmental Impact Statement and  
13 were fully analyzed in terms of environmental impacts and  
14 their operational impacts as well.

15 There was one alternative that we rejected. We  
16 analyzed it at the beginning and then rejected it from  
17 further consideration, and that was to extend the runway to  
18 the south by 1100 feet. This was not carried forward in  
19 either the EIS or the EIR because there were greater wetland  
20 impacts. There were some operational issues in terms of  
21 aircraft actually being able to use that extension fully, it  
22 brought aircraft closer to the residential areas to the  
23 south, and there was just a higher cost because of  
24 mitigation costs as well as some of the construction issues  
25 that exist down to the south of the airport.

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1 At this point I'm going to go through a couple of  
2 the categories of environmental impacts that we heard  
3 concerns about at the public scoping meetings. There are  
4 three of the categories in particular and the first one is  
5 noise. The way that we describe noise is called the  
6 Community Noise Equivalent Level or CNEL. These are  
7 standards that are used throughout the industry for  
8 describing specifically aircraft noise. The federal  
9 standard is 65 dB of CNEL. If you are exposed to that level  
10 of noise or greater than you are considered significantly  
11 impacted. The county's threshold is lower than the federal  
12 standard and is 60 dB of CNEL. So we looked at both of  
13 those, the 65 in the EIS and 60 in the EIR.

14 Currently there are no homes around Gness Field that  
15 are exposed to either the federal standard or the county  
16 standard of 65 and 60, respectively. What the analysis  
17 found when we looked at it was that with the project there  
18 would be no homes within the 65 CNEL or the 60 CNEL. So  
19 there would be no change in terms of the number of homes  
20 that fall within these areas. I think the bottom line is  
21 that the project would not specifically change flight paths  
22 from what currently exists today. If anything it might  
23 actually allow the aircraft to be a little bit higher if  
24 they are departing to the south and they may actually be  
25 able to turn a little earlier than they currently do. But

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1 in general this really doesn't change where the aircraft are  
2 flying today.

3 The next category was wetlands. And obviously with  
4 the no action there would be no wetland impacts. With the  
5 proposed project, which again is Alternative B, there would  
6 be 11.83 acres of wetlands impacted. With Alternative D  
7 there would be 12.73 acres of wetlands impacted. So  
8 Alternative B, the proposed project, actually has fewer  
9 impacts than the other alternative that we carried forward  
10 through both of the studies. But with impacts to wetlands  
11 we recognize that there is going to have to be mitigation  
12 that would come into play. The Draft EIS and Draft EIR both  
13 identified some sites that provided some feasible options  
14 for wetland mitigation. And currently there is consultation  
15 that is occurring with the FAA and the Corps of Engineers  
16 and the county in terms of trying to finalize the wetland  
17 plan before the final documents are put together.

18 Threatened and endangered species, both studies  
19 concluded that it was unlikely that there was going to be  
20 any taking of threatened and endangered species, meaning no  
21 specific species would be directly taken. However, there  
22 were habitat impacts that were identified in the study.  
23 Again, with the no action, with no changes to the airport  
24 there would be no impact. With the sponsor's proposed  
25 project we had - and we've divided this into two types of

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1 impacts, permanent and temporary - permanent impacts, which  
2 is really the area of where the new pavement would be built,  
3 would result in roughly 6.88 acres of wildlife habitat  
4 removal. The temporary removal area of 16.05 acres of  
5 habitat is the area that we would call construction staging.  
6 So where, you know, the bulldozers are parked and they are  
7 putting dirt and other materials, those areas we would  
8 anticipate would revegetate and come back to their natural  
9 state at some point.

10 But in any case there would be mitigation that would  
11 be required - I'm sorry, I skipped over Alternative D.  
12 Alternative D's permanent removal area was 8.24 acres and  
13 the temporary removal area was 18.43 acres. Again both of  
14 those are greater than the proposed project.

15 Now back to mitigation, there were several options  
16 identified in both the Draft EIS and the Draft EIR for  
17 mitigation opportunities. And both the FAA and the county  
18 are currently working with the Fish and Wildlife Service as  
19 well as some state agencies in terms of nailing down the  
20 exact mitigation sites and ratios and things of that nature.

21 So there are a number of other categories that we  
22 looked at. There is probably on the order of 18 or so those  
23 listed on the screen. And I apologize for the formatting  
24 there. But in terms of all of those categories, both  
25 documents concluded that there were no significant impacts

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1 for these categories there.

2 Okay, so the next steps in the process. The  
3 documents were published at the same time. They were  
4 published in late November and were put into the libraries  
5 at the airport and also on the website, there is a website  
6 there if people are interested in going to the website, it's  
7 listed. There are three ways that people can make comments  
8 on the Draft EIS and Draft EIR. First is they can come  
9 today obviously and make an oral testimony at the hearing  
10 today. They also can use this comment form that was passed  
11 out to everyone as they came in. And they have two options,  
12 they can either fill out this comment form and leave it in  
13 the comment box up here or on the back it has Mr. Pomeroy's  
14 address and you can fold this form up and you can mail it or  
15 fax it to Mr. Pomeroy before February 6, 2012. For those of  
16 you in the audience, Mr. Pomeroy's contact information is  
17 there as well if you want to write that down. And I'll  
18 leave this up for a few moments while we conclude things.  
19 Craig?

20 MR. TACKABERY: That would be the end of our  
21 presentation. We would be glad to answer any questions  
22 before you take testimony.

23 SUPERVISOR KINSEY: Thank you. Are there any  
24 questions from board members before we open the public  
25 hearing?

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1 (No comment)

2 If not, we will open the public hearing now. This  
3 is your opportunity to make oral comments. The public  
4 comment period will extend through February 6th of this year  
5 and then there will be written responses generated for all  
6 the comments received, both for the environmental document  
7 at the state level as well as the federal Environmental  
8 Impact Statement. I have speaker cards. I'm going to ask  
9 anyone who would like to speak to fill out a card. And I'm  
10 going to begin first with Steven Knecht, who is a  
11 representative of the Gness Field Community Association.  
12 Welcome, Mr. Knecht.

13 MR. KNECHT: Thank you, Mr. Chairman. If I may  
14 approach with a diagram that will be relevant -

15 SUPERVISOR KINSEY: You're welcome to provide that  
16 to our clerk and that will be fine.

17 (Mr. Knecht hands the document to the clerk, who  
18 distributes it to the board.)

19 MR. KNECHT: Also before I start, we have a number  
20 of members of GFCA, both pilots and non-pilots, who have  
21 taken their time to come today to show support for the EIR's  
22 conclusion and the runway extension project. I was  
23 wondering if we could take just one second to have them  
24 stand and be recognized.

25 SUPERVISOR KINSEY: Absolutely. Please stand and be  
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1 accounted for.

2 (Several persons in the audience stand up.)

3 All right.

4 MR. KNECHT: Thank you.

5 SUPERVISOR KINSEY: Thank you all for joining us.

6 MR. KNECHT: My name is Steve Knecht. I am on the  
7 board of the GFCOA, the Gness Field Community Association.  
8 This is a non-profit organization with over 100 direct  
9 members and another 100 or so Friends of Gness Field. The  
10 primary focus of our comments today will be on Section 4.7,  
11 the noise section of the EIR. And then we would like to  
12 close with several general comments.

24 [ 13 It probably comes as no surprise that GFCOA supports  
14 the long-planned runway extension project to bring Gness  
15 Field airport into compliance with FAA standards for runway  
16 overruns. And GFCOA appreciates the concerns of some  
17 neighbors to the south of the airport regarding noise from  
4.18 [ 18 aircraft. However, it may be a surprise that we feel this  
19 extension will provide a significant noise reduction for  
20 neighbors to the south of the airport, specifically in Rush  
21 Creek and Bahia. Section 4.7, page 32, states that the  
22 proposed project extends the runway to the north away from  
23 residential areas and therefore would not change the  
24 aircraft patterns to the south of the airport, as we just  
25 heard. However, GFCOA believes that there can be a

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1 significant and beneficial change, all be it a consensual  
2 agreement among pilots, to have the runway 13 departures,  
3 which are the most bothersome for the neighbors to the  
4 south, and we believe this change in the consensual  
5 agreement among pilots to move the departure to the north of  
6 the towers, as we will discuss here in a moment, will result  
7 in a greatly increased distance from the homes during the  
8 runway 13 departure.

4.19

9 So if you look at the diagram you will see that we  
10 are assuming that maximum power used at takeoff in fact  
11 creates the most noise for the homes and the departure, not  
12 from the south to the north but from the north going towards  
13 the homes on runway 13, creates the closest operations to  
14 those neighbors. The red line in the upper left quadrant  
15 shows the airport runway, the blue line above that shows the  
16 runway extension as proposed. And today what you have is  
17 the red line departing the runway when you're going from  
18 north to south you will see a standard crosswind departure  
19 would take the aircraft essentially right into the KCBS  
20 towers that there are four of and stand at approximately 400  
21 feet to the east of the runway.

22 Due to that the pilots tend to depart somewhere  
23 between the lines 2a and 2b, that's the tan zone below and  
24 to the south of the airport. You notice that that takes  
25 aircraft between 2000 and 4000 feet close to Rush Creek and

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(cont)  
4/19

1 roughly 1400 to 3800 feet away from the Bahia neighborhood.  
2 And perhaps sometimes if they are skirting the edge they may  
3 come as close as 1000 feet. Our comment is simply that we  
4 have met with the pilots at Gness Field, we have reached a  
5 general consensus and an agreement that, while the FAA may  
6 not change traffic advisories or noise abatement procedures,  
7 that the pilots feel that that 1100 foot runway extension to  
8 the north will allow them to takeoff earlier, achieve a  
9 higher elevation, avoid the towers and keep operations to  
10 the north in general for those pilots that are conducting  
11 themselves with an awareness of the noise abatement  
12 procedures. So we feel that this will provide a greatly  
13 reduced potential for noise to the neighbors to the south.  
14 We can assure you that GFCA will work diligently to educate  
15 pilots about how this 1100 foot move to the north can help  
16 reduce the noise and make us better neighbors with the  
17 neighborhoods to the south.

222

18 I have three small comments that may come up today  
19 that I just want to briefly explore and say that we know  
20 that the idea of a jet center was proposed about a decade  
21 ago for Gness Field but we want the public to understand  
22 that that 50 acre proposal is not this proposal, this is not  
23 a jet center proposal, and that the adjacent land, should  
24 that ever come forward again, would have to have its own EIR  
25 process and it takes a long time, as this process. Will

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2.6

1 there be more and larger jets because of a runway extension?  
2 Well, it makes sense that neighbors would be concerned about  
3 this and GFCA would like to extend an invitation to the  
4 neighbors and interested parties to discuss with them why  
5 Gness Field will probably never be use for commercial  
6 scheduled operations. But we don't have time for that today  
7 but we extend that invitation for discussion with the  
8 neighbors.

2.7

9 Regarding increases in charter jet traffic, no  
10 matter the length of the runway one can theoretically  
11 conclude that there will be an increase in the number of jet  
12 types that can land at Gness Field with this runway  
13 extension. However, jets do not conduct flight operations  
14 based on opportunity, rather jet operations are based on  
15 economic demand. That is, there is no unmet need today in  
16 Marin County and the frequency of operations directly  
17 matches and is driven by the current demand. Whether or not  
18 the runway is extended, if the demand increases for more  
19 charter and jet traffic it will occur even on today's  
20 runway. If the demand is there it will increase.

2.1

21 Will there be an increase in jet size? There is a  
22 reason that business jets are designed generally with six to  
23 eight passengers. Manufacturers have studied the usage and  
24 how many people go on business meetings and the six to eight  
25 passenger jet meets most of the private and business user

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(cont)  
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1 needs. It's for this reason that most business delegations  
2 traveling into and out of Marin will remain less than eight  
3 passengers. With this runway extension they may be able to  
4 land jets of 10 or 12 but the need may not be there and  
5 probably won't be there.

19.4

6 Last ten second comment, we appreciate the runway  
7 extension as pilots because of the increases it will achieve  
8 in safety and we believe that the runway extension will  
9 clearly provide an increase in safety for all pilots and  
10 aircraft using Gness Field, providing the FAA compliant  
11 overruns, greater runway length will assist pilots with  
12 aborted takeoffs, emergency operations, avoidance of bird  
13 strikes, and obstacles such as the radio towers near the  
14 field. Thank you for this opportunity.

15 SUPERVISOR KINSEY: Thank you. The next speaker is  
16 Susan Stompe, who will be followed by Joyce Wells and then  
17 Jackie Bonner.

18 MS. STOMPE: Thank you. Susan Stompe with the  
19 Marin Conservation League. Our comprehensive comments will  
20 be in before the 6th. But I had a couple of questions in  
21 advance of our sending a formal letter. One has to do with  
22 a request that we had made rather strongly in our scoping  
23 letter that aircraft be identified by model and make as to  
24 the full spectrum of aircraft that could use the field with  
25 its longer runway. And that was not done. It was stated

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1 that the probability is that the runway would be used by the  
2 current fleet and if the fleet increased in size it would be  
3 proportionally the same fleet that is there now. Our  
4 understanding of CEQA is that you should be looking at the  
5 maximum potential for the changes that are being requested.  
6 And we feel that was not addressed and we had some concerns  
7 about that.

13.20

8 On the wetlands that will be filled, there was not a  
9 very thorough description as to what the complexity of  
10 wetlands that will be filled, how they interrelate with each  
11 other and how they interrelate with the other wetlands that  
12 are around.

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13 And the third deficiency that we noticed was that  
14 sea level rise was never mentioned. I did not see those  
15 words in there. Now, FEMA and 100 year flood zones were  
16 addressed but that's a little different than sea level rise.  
17 So we would perhaps get some explanation now, but anyway we  
18 will have our more comprehensive submission later. Thank  
19 you.

20 SUPERVISOR KINSEY: Thank you. Joyce Wells, Jackie  
21 Bonner and then Christopher Gilkerson.

22 MS. WELLS: I first started flying in April of 1968.  
23 The airport was brand new. I am still flying. And the  
24 thing about the runway extension that I appreciate most is  
25 Gness is known for its crosswinds, it's known as one of the

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1 crosswind capitals of the Bay Area. And extending the  
 2 runway to the north, oftentimes the crosswinds are less  
 3 there. So to me it's also a big safety issue. I have had  
 4 to go and land at other airports at other times when the  
 5 crosswinds have been too severe for me to land. As I say,  
 6 I've been flying for quite some time. So that's the big  
 7 safety issue for me, is the crosswind component. And when  
 8 this airport was first built there were no houses south of  
 9 the airport.

10 SUPERVISOR KINSEY: Thank you. Jackie Bonner  
 11 followed by Mr. Gilkerson and then Rob Pack.

12 MS. BONNER: My name is Jackie Bonner and I live in  
 13 Rush Creek on Saddle Wood Drive south of Gness Field. And  
 14 I've lived in Novato since 1968. We, mostly residents of  
 15 the communities just south of Gness Field, are submitting a  
 16 petition to the Board of Supervisors today regarding the  
 17 Draft Environmental Impact Report for the proposed extension  
 18 of the runway at Gness Field. Because of the holiday and  
 19 lengthy EIR reports we only began collecting signatures on  
 20 Friday but we already have 80 and most of those people  
 21 couldn't come because it was such short notice for them.

22 Out petition is clear. We do not oppose the airport nor  
 23 five of the six elements of the project necessary to make  
 24 the airport safer.

25 We do object to the full 1100 foot extension of the  
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1 runway, which we believe will have a significant noise  
 2 impact on our homes, families and quality of life. With the  
 3 existing 3300 foot runway the Draft EIR documents dozens of  
 4 overflights over our homes. This occurs frequently despite  
 5 the voluntary noise abatement guidelines the airport  
 6 communicates to pilots. The guidelines are just that,  
 7 guidelines. When residents call the airport manager there  
 8 is typically no response. And our research indicates that a  
 9 longer runway will result in more jets and bigger jets and  
 10 additional noise. This noise disturbance is dismissed in  
 11 the Draft EIR through what we believe is use of bad data,  
 12 assumptions and logic.

13 Out petition requests that you, the Board of  
 14 Supervisors, direct the environmental consultants to, one,  
 15 consider a shorter runway extension, one that meets but does  
 16 not exceed the basic requirements of Gness Field's current  
 17 and proposed B-1 designation. From the Draft EIR and the  
 18 FAA's advisory circular we believe that a runway of  
 19 approximately 3500 square feet (sic) would meet this  
 20 purpose. Two, consider the impact of additional jets that  
 21 will be able to take off at Gness Field if the runway is  
 22 extended to 4400 feet. The Draft EIR claims that this  
 23 length of runway will not result in additional or larger  
 24 jets using Gness. We believe that this defies logic and  
 25 current airport users admit they want the extension so that

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1 they can land bigger jets, all be it not fully loaded.  
2 Three, provide a study showing which current airport tenants  
3 are required to reduce fuel, passenger load or cargo as a  
4 result of the 3300 foot runway and how frequently. The  
5 Draft EIR indicates that only about three percent of  
6 takeoffs are so affected and we would like an explanation of  
7 the rationale for spending \$11 million of taxpayer money to  
8 benefit so few. Four, the Draft EIR should address the  
9 knock-on effects of future development at the airport as a  
10 result of extending the runway. The report is silent on  
11 this.

12 And we request that you direct the EIR consultant to  
13 address these four points and trust that you the Marin  
14 County Supervisors will consider our requests and do what is  
15 best for all the people of Novato and Marin County. Thank  
16 you.

17 SUPERVISOR KINSEY: Thank you. Okay, Mr. Gilkerson  
18 followed by Mr. Pack then Mr. Bracey.

19 MR. GILKERSON: Thank you. We do have copies of  
20 the petition Ms. Bonner mentioned that we can give to you.  
21 And we are still collecting signatures. My name is  
22 Christopher Gilkerson, I live at 220 Saddle Wood Drive in  
23 Novato. A number of us will be submitting a more extensive  
24 comment letter by February 6th but I wanted to elaborate on  
25 a few of the key points in the petition that was just

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26

1 mentioned: the purpose of the expansion and who it will  
2 benefit and the noise impact of this runway extension.

3 First, what's the purpose of extending the runway to  
4 the full 1100 feet? Well, there is only one cited in the  
5 Draft EIR, it's to enable corporate jets to takeoff with  
6 full fuel capacity on those few hot days when they plan to  
7 travel a long distance, that's it, that's the purpose in the  
8 EIR. It's not for emergency preparedness. It's also not to  
9 enhance the safety for the current users of the airport.

10 The widening of the runway several years ago served that  
11 purpose to compensate for the crosswinds. And the proposed  
12 extension of the runway safety areas at each end of the  
13 runway and extending the taxi area, two other aspects of  
14 this project will also contribute to the airport safety.  
15 Now, if you ask any pilot if they want a longer runway,  
16 chances are they're going to say yes. It's like asking  
17 taxpayers if they want to pay less taxes. But the purpose

18 of the project has to be supported by data. Even those few  
19 corporate jets that call Gness Field home don't need an  
20 extended runway for safety purposes. Today they simply  
21 reduce their fuel weight on a few particularly hot days when  
22 they want to travel to places like Denver. There is no  
23 evidence at all in the Draft EIR indicating how many actual  
24 takeoffs have been impacted in that manner.

25 A key unanswered question is: Who is the three  
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1 percent? The three percent who actually own and use  
2 corporate jets from Gness Field today. How do their  
3 interests weigh against the hundreds of homeowners to the  
4 south of the airport who will be negatively impacted by the  
5 noise created by any increase in overflights. So these are  
6 the interests that have to be balanced and as members of the  
7 Board of Supervisors we hope you will balance those  
8 interests.] Now, one way to do that is by proposing a

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9 smaller runway extension. For a B-1 general aviation  
10 airport, which Gness Field is, the recommended length is  
11 about 35000 feet. The Draft EIR makes a critical mistake in  
12 not considering that alternative.

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13 As for the interests of Gness Field's neighbors to  
14 the south of the airport, we accept that from time to time  
15 there will be overflights and some noise disturbance.  
16 However, our research shows that extending the runway will  
17 result in a change in the types and sizes of the jets that  
18 can land at Gness Field, faster, louder, and they will need  
19 a larger approach to land from the south over our homes.  
20 Although extending the runway to the north may help reduce  
21 overflights from takeoffs, as we heard, it's not going to do  
22 anything about overflights from landings that come from the  
23 south, that's what our concern is.

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24 Now, in terms of that noise impact, the EIR makes  
25 three fundamental flaws. First, it's based on sketchy radar

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1 data from 2007 supplemented by self-serving undocumented  
2 discussions with local airport staff and users. Second,  
3 it's premised on unsupported assumptions that extension of  
4 the runway 1100 feet won't lead to any change in the fleet  
5 mix. There is no analysis at all about the fleet mix at  
6 airports that today have a runway between 4000 and 4500  
7 feet. Now, although there have been dozens of overflights  
8 of jets and prop planes that disturb residential areas, as  
9 documented in the Draft EIR, here is how the Draft EIR  
10 dismisses those overflights, and I'm quoting:

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11 "The noise generated by pilot overflights is not a  
12 direct impact of airport operations since airport  
13 approach and departure protocols are designed to  
14 avoid aircraft overflights of residential  
15 communities. Accordingly, noise resulting from  
16 aircraft overflights is directly related to  
17 individual pilot behavior and not due to the  
18 airport. Therefore, the noise impact of the  
19 proposed project is deemed less than significant."

20 So that's like saying a landfill is not responsible  
21 for toxic leaks because people throw away things they  
22 shouldn't. It doesn't make any sense.

23 SUPERVISOR KINSEY: Time, sir.

24 MR. GILKERSON: And as I mentioned we will be  
25 submitting a longer comment letter and we appreciate you

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1 listening to our comments. Thank you.

2 SUPERVISOR KINSEY: Thank you. Mr. Pack followed by  
3 Mr. Bracey followed by Steven Nebb.

4 MR. PACK: Hi, I'm Rob Pack. I've lived on Laguna  
5 Vista Drive for 35 years. I'm against the runway extension,  
6 I am for the safety extensions on the end of the runway.  
7 I'm going to limit my comments to the technical section in  
8 Volume 3. My background is I have Bachelor's and Master's  
9 Degrees in Aeronautical Engineering, a Commercial Pilot's  
10 License, engineering flight test experience with the United  
11 States Air Force, Lockheed Aircraft Company and United  
12 Airlines and I own an airplane, not based at Gness.

13 All the discussions that we've just had from the  
14 previous speakers have taken the wind out of my sails. I  
15 think I would like to point out that one of the only reasons  
16 given for doing this expansion, regardless of all the  
17 mitigation to accomplish that, is that this only affects  
18 about one percent of the airplanes at Gness and it probably  
19 only affects that one percent about five percent of the  
20 time, on hot days when they are taking off at max takeoff  
21 gross weight. Now, if you have a charter operation - some  
22 things have been mentioned - but you can always takeoff an  
23 hour or two earlier or later when the day is a little  
24 cooler.

25 The FAA's own studies have shown that the most

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1 dangerous situation at an airport is where you have a  
2 combination of high speed and low speed aircraft, jets and  
3 training aircraft and no control tower. And that's exactly  
4 the situation that is at Gness now and will be certainly  
5 increased. There are approximately 10,000 commercial  
6 business jets in operation in the United States. Only a  
7 handful can use Gness at 3300 feet. If we extend that it  
8 only seems like an extra 1100 feet but it opens Gness to a  
9 big wide world of commercial jets that just can't operate  
10 out of there right now. Right, the Gulfstreams may not be  
11 able to come in fully loaded and takeoff fully loaded but  
12 they can still operate out of there on normal days at normal  
13 weights.

14 I think the thing that was revealing to me was, for  
15 the first time I heard the real reason for this whole  
16 process and it's money. The county is not making any money  
17 at Gness. Business aviation, flying is down, they are  
18 probably having a lot lower income. I'm not an accountant  
19 so now I'm going beyond my expertise. But it would be my  
20 guess that the money that they are getting from fuel tax is  
21 way down. And of course one of the big items for the  
22 aircraft for the income for the airport is the property tax  
23 on the airplanes. Now, if you bring in a \$20 million  
24 business jet that brings in a heck of a lot of property tax  
25 compared to a typical general aviation airplane. So I think

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1 the thing that bothered me the most about this was nobody  
 2 came out and said, We want to do this, we're going to make a  
 3 lot of money doing this and we don't think it's going to be  
 4 too bad. No one said anything about the money. Thank you.

5 SUPERVISOR KINSEY: Thank you. Mr. Bracey followed  
 6 by Mr. Nebb and then Bob Spofford.

7 MR. BRACEY: Clarence Bracey, a Novato resident,  
 8 Black Point actually. I've been a resident for 42 years.  
 9 My opposition to the proposed expansion of the Gness  
 10 Airfield runway is based upon the same concerns that  
 11 prevailed during the 1997 proposal. The rationale at the  
 12 time was, number one, basically all aircraft create a  
 13 disturbing and uncontrollable noise nuisance. More and  
 14 longer corporate jets exacerbate the nuisance. Number two,  
 15 there will be an ultimate decline in residential property  
 16 values within the vicinity of the airport facility. Number  
 17 three, there would be significant degradation of  
 18 environmental values including safety concerns, i.e., the  
 19 runway is located within the Pacific Flyway, the Bay Delta  
 20 Estuary. Migrating birds using the flyway poses a safety  
 21 hazard to aircraft in flight. Number four, an extended  
 22 runway permits and invites extended runway use and larger,  
 23 noisier corporate jets. A crowded flyway is no safer travel  
 24 choice than crowded freeway travel choice. Thank you.

25 SUPERVISOR KINSEY: Thank you. Mr. Nebb, then Mr.  
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1 Spofford, then Patricia Capretta.

2 MR. NEBB: Good afternoon. My name is Steven Nebb,  
 3 I live in Novato in Rush Creek as well. Thank you for the  
 4 time to speak and to get our points across, I appreciate  
 5 that.

6 Prior to moving the Marin County I lived in  
 7 Washington, D.C. and I consulted with the FAA and DOD over  
 8 various topics, some of them being project planning,  
 9 contract negotiation-type work, and analysis of engineering  
 10 change orders, highly technical issues. So I have some of  
 11 the background in this area. I'm not a pilot but at least  
 12 I've analyzed things. I have also reviewed both reports and  
 13 have some concerns about the completeness of the analysis,  
 14 the accuracy of important calculations and the lack of  
 15 support typically provided in other similar analysis.

16 According to the master plan from Marin County,  
 17 Gness Field is designated as a B-1 type airport. That's  
 18 important. The first letter is for the speed of the plane  
 19 as it approaches the airfield and the second effectively the  
 20 size, wing span. And so if the goal of the project is to  
 21 make it safer to land for those planes, that's great. We  
 22 don't oppose those aspects of the plan like the taxiway and  
 23 the safety areas. But it doesn't necessarily support the  
 24 length. One of the major weaknesses is that for any FAA  
 25 designated project that receives FAA funding there is

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1 supposed to be the addressing of an advisory circular,  
2 Advisory Circular 150/5325-4B, runway length requirements  
3 for airport design. If that was addressed in the EIR and  
4 appropriately reviewed the recommended runway length would  
5 have been 3500 feet. The use of other planes, critical  
6 designated planes, is appropriate; however, they typically  
7 have data to support that. The EIR does not have that data.  
8 They also use larger planes that B-1s to support their  
9 analysis. The Cessna 525A and 525B are not B-1 type planes,  
10 they are B-2 type planes.

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11 So there really is a limited need, as was addressed  
12 in a few other comments. It's on page 2-2 of the EIS, 3000  
13 flights out of 95,000 are weight-restricted. This number  
14 may be a figure involving larger planes as well, not  
15 necessarily B-1 planes. The 525, which is the critically  
16 designated plane or design plane, only has an issue when the  
17 temperature is 78 degrees or hotter. In Marin County at  
18 Gness Field that only happens eight percent of the time, the  
19 rest of the year there is no issue. The EIR says there is  
20 no weight restriction for planes during standard days,  
21 that's in Appendix D on page 11. The Appendix on page 16  
22 says that when there is weigh restriction the critically  
23 designated plane only has 680 nautical miles. The manual  
24 for that plane says the maximum distance is 776 nautical  
25 miles. So it really only is an issue if you're trying to

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1 fly in between those two distances, which probably is fairly  
2 rare. You can go all the way up to Vancouver, Canada, all  
3 the way to San Diego, all the way to Grand Junction,  
4 Colorado on 680.

5 SUPERVISOR KINSEY: Your time is up. If you would  
6 like to make any closing comment.

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7 MR. NEBB: Closing comment. If the 4400 feet were  
8 put in place I did analysis that showed that larger Cessna  
9 planes, B-2 category planes, could effectively use the  
10 runway, louder and faster planes, Learjet and Sabreliners  
11 potentially could use the runway, too. And that's a very  
12 significant concern. Thank you.

13 SUPERVISOR KINSEY: Thank you. Okay, Mr. Spofford  
14 and Ms. Capretta followed by Dr. Richard Levy.

15 MR. SPOFFORD: Hi, I'm Bob Spofford. I sort of have  
16 a leg in both camps here. I'm a board member of a number of  
17 environmental organizations and I've spoken to the  
18 supervisors a number of times on those issues. But I also  
19 am an airplane owner and I've kept a plane at Gness for the  
20 past 15 years.

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21 Clearly the issue that is driving most of the  
22 discussion here is this question of will or won't larger,  
23 noisier planes start using Gness if the runway extension is  
24 built. That actually is addressed pretty unequivocally in  
25 the EIR. It says no, they will not. The problem is it's

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1 buried in various sections as sort of a naked one sentence  
2 assertion and it's never pulled together. Most of the  
3 reasons for that are also buried at various parts of the  
4 staff report and the EIR itself. And it's not just the  
5 runway length but the runway length basically says even at  
6 4400 feet the vast majority of larger jets, the ones that  
7 are in use commonly today - and Sabreliners and Learjets,  
8 small Learjets aren't - that those planes still wouldn't be  
9 able to use that runway at any kind of, you know,  
10 commercially usable weight for them.

11 But there are other issues above and beyond just the  
12 runway length. We've got an instrument approach that only  
13 goes down to 1000 feet, which means that no operator coming  
14 in there could reliably plan to land there in any weather  
15 the way they can at Napa or at Santa Rosa and there is no  
16 fixed base operator, there is no infrastructure on the  
17 ground for somebody operating a large jet. So basically  
18 they are saying, Well, we can take you to a place with a  
19 lovely executive terminal at Napa, or actually two of them  
20 at Santa Rosa, or we can take you and sort of dump you in  
21 the parking lot at Gness and you can find a pay phone  
22 someplace and call a cab. That's a pretty large, you know -  
23 people who fly around in \$50 million jets really don't like  
24 to be dumped in the parking lot and pointed toward the phone  
25 booth.

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1 All those things are in there someplace but my  
2 recommendation for the EIR is that you desperately need  
3 somewhere in the executive summary calling out that  
4 conclusion. What is the conclusion about larger, noisier  
5 jets using that airport, about the runway extension causing  
6 any increase in traffic, and then pull out and support that  
7 with all the various specific points and make that a section  
8 of the report that deals with that issue. Because all these  
9 issues about noise and air quality and things like that  
10 basically just flow from the answer to that question. So  
11 thank you.

23.9

12 SUPERVISOR KINSEY: Thank you. Ms. Capretta,  
13 followed by Dr. Levy, followed by Rich Elb.

14 MS. CAPRETTA: Good afternoon. My name is Patricia  
15 Capretta. I am a resident of Bahia, Novato for several  
16 years.

17 I'm bringing to light a little bit of a different  
18 focus. My husband and I believe very strongly in  
19 environmental issues and we are quite concerned about the  
20 number of planes that could thereby come to Gness. And, as  
21 we all know, December has been the second driest month in  
22 history. Let's picture more planes coming in, the impact  
23 that it will have on the environment is disastrous. It will  
24 impact, it does impact, light hasn't been shed on it fully  
25 because it's a big business but it's something that needs to

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1 be addressed.

2 A second component is I am also an RN and I have for  
3 years - I don't currently do but I was a flight nurse and I  
4 had an experience in a flight that I was taking. It wasn't  
5 over California, however I flew in a Learjet as a flight  
6 nurse and we had a near crash landing. We, thank God,  
7 landed at a very small airport but we had no business  
8 landing at that type of airport. We basically almost lost  
9 our lives and I'm here to say that if I had to do it over  
10 again, thank God it was there but it absolutely had no - it  
11 should never have happened and we should never have landed  
12 at an airport so small. Because we basically ruined the  
13 plane, you know, injured ourselves, it's not something I  
14 would like to see happen. I have children, there are many  
15 children in our neighborhood. We see the planes come and  
16 go, we can read the tag numbers on the planes. And it  
17 frightens us to think that something coming so low over our  
18 neighborhood could, you know, result in a disaster that I  
19 experienced.

20 There was a plane crash years ago in our  
21 neighborhood and we certainly don't want to see that happen  
22 again. And I know that the planes are supposed to take a  
23 current route away from our neighborhood, but they don't.  
24 Many, many of them fly overhead. And there is calls made  
25 into the management at Gnos. Nothing happens. And it's a

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1 concern. I would hate to see that happen to anybody in the  
2 future. Thank you.

3 SUPERVISOR KINSEY: Thank you. Dr. Levy, then Rich  
4 Elb and that is our final speaker. If anyone else wishes to  
5 speak they should fill out a card and get it to our clerk.

6 DR. LEVY: My name is Dr. Richard Levy. We live at  
7 2516 Laguna Vista Drive in Novato, which is just one air  
8 mile from the south end of the airport and on the highest  
9 ridge near the airport.

10 We have lived in the Bahia Ridge area for 14 years  
11 and literally I have made hundreds of phone calls to the  
12 airport when an airplane went over our home at a low height  
13 and was way off the corridor in which it was supposed to  
14 fly. These calls were mostly unanswered or when they were  
15 we were told that the management of the airport would look  
16 into this. There was no change. Over the years I've become  
17 an old man and it is tiring and burdensome to continue  
18 making calls that have no beneficial outcome. And, yes,  
19 there are one or two pilots who continuously cut over our  
20 home in an effort to decrease flight time by one to two  
21 minutes. I cannot see well enough to read any numbers on  
22 the plane's wings to report some of the infractions. Not  
23 only are they the consistent pilots but there's new pilots  
24 who don't follow the policies.

25 The federal government and the County of Marin have

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1 spent a lot of time and energy in trying to redesign the  
 2 airport. What is missing is any enforcement of standards or  
 3 policies to stop individuals from flying over our  
 4 neighborhood. Volume 2 of the DEIR spends a lot of  
 5 explanation about noise and how it will affect surrounding  
 6 neighborhoods. This may be true if planes did not fly over  
 7 our homes. The point is, they do fly over our homes and  
 8 there is no regulatory control or enforcement over them.  
 9 You have not taken a macrocosmic look but a microcosmic  
 10 look, just looking at the airport not the other areas when a  
 11 plane goes off its course, which happens very often.

12 Our second and last point concerns airport lighting.  
 13 I will quote the Environmental Impact Statement about  
 14 lights.

15 "It is possible that the residents at the highest  
 16 points of the residential area may be able to see  
 17 the PAPI lights but given the angle and the  
 18 distance these lights would not be intrusive."

19 Well, come to my home, they are intrusive. Not only are  
 20 those lights intrusive but the beacon lights from the  
 21 airport do shine into our bedrooms, despite what has been  
 22 written in your proposal Alternative B as well as in  
 23 Alternative A, the no impact. What can you do to abate this  
 24 nuisance and intrusion? Thank you for your attention in  
 25 addressing our concerns.

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1 SUPERVISOR KINSEY: Thank you, Dr. Levy. Rich Elb  
 2 and then I believe we did receive one additional speaker  
 3 card. Thank you, Craig. Mr. Elb followed by Kirk Heiser.

4 MR. ELB: Good afternoon. My name is Rich Elb, I  
 5 live at 2304 Laguna Vista and I have been a Bahia resident  
 6 for 40 years, I own two homes there. I've lived on Laguna  
 7 Vista for over 20 years. I am also an airplane owner and a  
 8 pilot that flies out of Gness Field. The airplane that I  
 9 fly is a small airplane, it's not a jet, but I have been a  
 10 corporate pilot and I've flown small jets in and out of  
 11 Gness Field.

12 For the most part, all the pilots that fly in and  
 13 out of Gness Field try to adhere to the - or do adhere to  
 14 the noise abatement procedures. Occasionally when aircraft  
 15 come from other venues, it could be Half Moon Bay, it could  
 16 be, you know, from Idaho somewhere, they don't get  
 17 themselves up to speed possibly as to the flight areas that  
 18 they should be flying over and occasionally there is an  
 19 overflight and sometimes it's over my house. And that  
 20 doesn't make me any happier than any of the other residents  
 21 that are non-pilots. But basically we formed the Gness  
 22 Field Community Association to try and educate and spread  
 23 the word so we could be better neighbors with our Bahia and  
 24 Rush Creek residents. We've only been in existence for  
 25 about a year and a half now and we're trying to get the word

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(cont)  
 4.5

16.2

4.5



1 out because we want to be good neighbors.

2 And as far as from the pilot's side of it, I do  
3 believe that this runway extension will be a safety feature  
4 for us pilots. The crosswinds in the summertime can be  
5 quite severe. People still try and maneuver their airplanes  
6 and land in these crosswinds. With another thousand feet  
7 for the landing aspect of it, it would take us a little bit  
8 further away, we could land further down the runway where  
9 the crosswinds are less severe and that would be a safety  
10 factor. As far as the noise goes, taking off on 13, which  
11 is the designated runway to takeoff and to the south, I  
12 believe that we would be turning out sooner and bring the  
13 noise further to the noise and not bother our neighbors in  
14 Rush Creek and Bahia.

15 So basically that's what I have to say and we'll see  
16 how it goes from there. Thank you.

17 SUPERVISOR KINSEY: Thank you for your comments.

18 This will be our final speaker, Mr. Heiser.

19 MR. HEISER: Thank you. My name is Kirk Heiser and  
20 I am a Novato resident, I'm a pilot, I live out one mile off  
21 the end of Runway 31. I've lived there for 22 years.

22 I just wanted to state that I have never had issues  
23 with sound whatsoever. The aircraft have never been a  
24 problem. I fly out of Gness and with this extension it will  
25 improve the overall safety for the residents and I think it

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1 will reduce the sound levels. And I'm out of time for my  
2 parking so I will wish everybody good day. Thank you.

3 SUPERVISOR KINSEY: All right, you've got to fly.  
4 Okay, with that I will close the public hearing for this and  
5 offer the opportunity for Mr. Pomeroy to make any comments  
6 that he may wish to at the end of this, if you choose to.  
7 Is there anything you would care to say?

8 MR. POMEROY: No, nothing further other than closing  
9 the federal hearing.

10 SUPERVISOR KINSEY: Okay, so both the federal  
11 hearing and the CEQA hearing for our board have been closed.  
12 In terms of next steps, I'm looking if there are any  
13 comments that any board members wish to make at this time,  
14 beginning with Supervisor Arnold.

15 SUPERVISOR ARNOLD: Thank you. First, Craig, there  
16 was a statement made that said "Ga-Noss" and it is "Ga-  
17 Noss", right?

18 MR. TACKABERY: Yes.

19 SUPERVISOR ARNOLD: I knew that. Okay. Gness will  
20 probably never be used, probably never be used for  
21 commercial aircraft. I want to ask you to clarify, it's my  
22 understanding that commercial aircraft is absolutely not an  
23 option, is that correct?

24 MR. TACKABERY: I will look to somebody else to -  
25 that's my understanding but we have some other experts in

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1 the room.

2 SUPERVISOR ARNOLD: Great.

3 MR. TACKABERY: Maybe somebody else wants to reply  
4 about this.

5 MR. POMEROY: Are you asking about scheduled  
6 commercial service?

7 SUPERVISOR ARNOLD: Yes.

8 MR. POMEROY: That would require Marin County to  
9 pursue that and seek an Operating Certificate under Part 139  
10 for the airport, of our federal regulations.

11 SUPERVISOR ARNOLD: Thank you.

12 Then I just would like to thank everybody who came  
13 today to comment on this project. I think a lot of  
14 questions were brought up today and many specifics to this  
15 project. And I would like to request and have spoken to  
16 staff and ask that they come back to the board, to our  
17 board, before the final EIR hearing to provide an  
18 informational update on the airport. I think as we move  
19 through this process it would be beneficial to our board and  
20 the public to learn more about Gness operations, costs and  
21 revenues and the proposed project.

22 I think it's important also for the public to  
23 remember that this hearing today is about the adequacy of  
24 the Draft EIR. We are not approving or considering the  
25 proposed project at this hearing. And approval of the EIR

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1 is not even an approval of the project. I appreciate all of  
2 the people who came here today to comment, all of the  
3 concerns and questions that were raised today and that will  
4 be responded to in the final EIR.

5 SUPERVISOR KINSEY: Thank you. There are no other  
6 board members who wish to speak. Craig, is there anything  
7 that you or Rob or Sarah wish to make any final comments to  
8 our board?

9 MR. TACKABERY: I just want to reiterate that we  
10 welcome public written comments through February 6th to  
11 Doug's attention.

12 SUPERVISOR KINSEY: And then it will be perhaps as  
13 late as the Fall before we would come back here for final  
14 consideration?

15 MR. TACKABERY: Yes, most likely.

16 SUPERVISOR KINSEY: Okay, thank you. With that we  
17 will conclude the public hearing for both the NEPA and the  
18 CEQA process and adjourn. Thank you.

19 (Hearing adjourned at 3:07 p.m.)

20

21

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## **APPENDIX Q**

### **FAA RESPONSE TO COMMENTS**

#### **HOW TO USE APPENDIX P, COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) AND DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) AND APPENDIX Q, RESPONSE TO COMMENTS**

As the Draft EIR and Draft EIS were circulated together during the official comment period, all comments on both documents are provided in Appendix P, *Comments Received on Draft EIS/EIR*. All responses to comments are provided here in Appendix Q, *Response to Comments*. Directions for how to use Appendix Q are below. See the beginning of Appendix P, *Comments Received on Draft EIS/EIR* for instructions on how to use Appendix P, *Comments Received on Draft EIS/EIR*.

Many commenters did not distinguish whether they were commenting on the Draft EIR or the Draft EIS, but instead provided comments by topic. This response to comments addresses comments by topic, regardless of whether the comment was made on the Draft EIR or the Draft EIS, or was not specific as to which document was being commented upon.

This appendix includes responses to agency, organization and individual comments that were received during the public comment period on the Draft Environmental Impact Statement and the Draft Environmental Impact Report. The public comment period extended from December 9, 2011 to February 6, 2012 and including a public hearing to receive comments on January 10, 2012. During the public comment period a total of 169 separate comment letters and oral comments were received, but the total number of commenters was less than 169 as some commenters who submitted written comments also provided oral comments at the public hearing and/or submitted or cosigned more than one written comment letter. Comments were received from Federal, State, and local agencies, organizations, and individuals. Comment letters and oral comments on the Draft Environmental Impact Statement and Draft Environmental Impact Report are in Appendix P, *Comments Received on Draft EIS/EIR*.

This Response to Comments section first provides a Detailed Master Response to four topics which were commented on by many commenters including the aviation forecast, runway length analysis, aircraft operations and aircraft noise levels, and induced airport growth.

After the Detailed Master Responses, the responses to more specific comments are provided. These specific responses to comments are organized by the 26 specific topics used to categorize the public comments and oral statements at the public hearing. These categories are:



<b>Comment Topic</b>	<b>Description</b>
1	Purpose and Need
2	Aviation Forecast
3	Alternatives
4	Noise
5	Land Use
6	Socioeconomic
7	Secondary
8	Air Quality
9	Water Quality
10	Section 4(f)
11	Historic
12	Fish, Wildlife, and Plants
13	Wetlands
14	Floodplains
15	Energy/Public Services
16	Light
17	Redwood Landfill
18	Construction
19	Safety
20	Runway Performance/Wind
21	Transportation
22	Cumulative
23	General
24	Support of Project
25	No Comment
26	Soils

For example Comment 2.1 was "The runway extension = larger/more aircraft at DVO." This issue was commented on by several individuals including in written comments by Bonner, Dunadio, Gilkerson, Gilkerson and Nebb families, Levy, Pack, Silveira family, Weber and Ross, Weber, in the public hearing by Knecht for Gross Field Community Association, Wells, Gilkerskon, Pack, Bracey, Nebb, Spofford, and Capretta. In every letter this comment is identified as Comment 2.1, and the response to this comment is shown in Table Q-1, in numerical order at Comment 2.1. The responses to all specific comments follow this format.

Readers interested in all responses to public comments can review Appendix Q, *Response to Comments* in its entirety. Readers only interested in responses to specific comment letters or statements can use the listing below to review the Appendix Q, *Response to Comments* for responses to all comments received from a specific commenter in the order they were made in the commenter's letter.



NAME	ORGANIZATION (IF ANY)	DATE	COMMENT NUMBERS
Kathleen Martyn Goforth	U.S. Environmental Protection Agency	2/6/2012	3.1, 3.2, 3.7, 1.1, 3.2, 3.2, 1.3, 13.1, 13.2, 3.2, 13.3, 13.2, 14.3, 3.2, 14.3, 19.1, 5.1, 19.1, 5.1, 7.1, 7.1, 2.1, 7.1, 4.2, 3.4, 3.5
Gregor Blackburn	Federal Emergency Management Agency (FEMA)	12/21/2011	14.1, 14.2, 14.9, 14.10, 14.11,
Gary Arnold	California Department of Transportation (CDOT)	12/19/2011	21.1, 21.2, 21.3, 21.3
Carl Wilcox	California Department of Fish and Game	1/9/2012	23.1, 12.1, 12.2, 12.3, 3.6, 12.4, 12.5, 5.1, 12.7, 12.8, 12.8, 12.9, 13.5, 13.6, 13.7, 13.8, 13.9, 13.10, 14.4, 14.5, 14.6, 14.7
LTC Kenneth M. Koop	California Air National Guard (CANG)	1/12/2012	No Comments
Mark Janofsky	County of Marin (MARIN)	2/6/2012	5.1, 5.2, 5.3, 17.1, 17.2, 17.1, 17.3, 17.4, 17.5, 5.4, 17.1, 17.4, 17.5, 17.3, 17.6, 17.7, 17.8, 17.7, 9.2, 17.2, 17.1, 17.7, 17.1, 17.1, 17.9, 17.6, 17.7, 17.8
Osha R. Merserve	RLI	2/6/2012	23.4, 23.8, 5.2, 5.2, 5.2, 5.9, 17.5, 17.7, 17.7, 17.10
Chris DeGabriele	North Marin Water District (NMWD)	12/6/2011	9.1
Elizabeth Dunn	City of Novato	2/6/2012	4.3, 4.4, 6.1, 6.2, 6.3, 22.1, 19.2, 23.2
Robert Patterson	City of Petaluma	2/3/2012	4.1
Susan Stompe	Marin Conservation League (MCL)	2/6/2012	2.1, 13.2, 13.11, 14.3, 14.3, 14.8, 4.3, 4.5, 9.3, 9.4, 13.11, 2.1, 4.2, 4.5, 10.1, 19.3
Barbara Salzman and Phil Peterson	Marin Audubon Society (MAS)	2/6/2012	23.3, 3.7, 3.6, 5.5, 2.2, 2.3, 19.2, 20.2, 2.4, 20.6, 26.1, 4.6, 5.1, 5.6, 12.10, 10.2, 13.3, 13.12, 12.6, 13.13, 13.11, 13.11, 13.14, 13.15, 3.8, 2.1, 2.3, 2.5, 13.7, 5.7, 13.2, 26.2, 26.2, 26.2, 26.2, 13.16, 12.11, 13.12, 13.15, 13.11, 13.11, 13.17, 13.11, 13.12, 12.12, 13.11, 12.13, 13.3, 18.1, 4.7, 13.11
Board of Directors	Gnoss Field Community Association (GFCA)	2/4/2012	24, 4.18, 4.18, 2.6, 2.6, 20.13, 2.1, 2.1, 22.2, 2.1, 2.1, 2.6, 4.18, 19.4, 4.20, 4.18,



NAME	ORGANIZATION (IF ANY)	DATE	COMMENT NUMBERS
C. Henry Barner	Black Point Improvement Club (BPIC)	1/4/2012	2.3, 23.5, 2.1, 23.6, 4.5
Wright Bass	Bass	1/10/2012	4.10, 20.5, 4.11, 4.12, 19.4, 16.1, 19.4
Jacqueline A. Bonner	Bonner	2/6/2012	4.5, 3.9, 3.10, 2.1, 3.2
David Donadio	Donadio	1/10/2012	2.1, 4.8, 4.5
Jim Duckworth	Duckworth	2/3/2012	24, 19.4, 19.4, 20.4, 19.4, 4.9, 4.9, 24
Christopher Gilkerson	Gilkerson	2/6/2012	1.6, 1.4, 20.1, 3.3, 2.1, 4.14, 4.8/4.13, 4.5/4.15, 1.6, 20.1, 1.3, 1.8, 20.8, 20.11, 20.10, 20.9, 20.8, 20.10, 20.12, 3.9, 3.2, 3.3, 2.1/2.2, 4.2a, 4.2, 4.14, 4.5/4.15, 4.21, 5.1/5.6, 13.19, 3.2, 3.2, 3.12, 3.13, 14.3, 14.3, 23.4
Dr. Richard Levy	Levy	2/6/2012	4.5, 16.2, 2.1, 1.5, 3.2, 4.13, 4.5, 3.3, 2.1, 20.1, 22.2
Edward A. Mainland	Mainland	2/5/2012	14.3
Rod Mehrten	Mehrten	1/22/2012	24
Steven Nebb	Nebb		3.2, 20.9, 2.1, 2.1, 20.8, 1.3, 1.7, 20.9, 3.3, 20.9, 20.10, 20.8, 20.12, 3.2, 3.5, 4.17
Robert Pack	Pack		1.3, 2.1, 19.5, 19.5, 1.3, 20.7, 19.6, 1.3, 1.4, 3.11
Charles Roell	Roell	1/10/2012	20.4, 4.9, 19.4
Barbara Rozen	Rozen	1/7/2012	13.18, 12.4, 10.3
Anthony and Lorraine Silveira	Silveira Ranches	2/3/2012	4.16, 2.1, 5.8, 23.7
Jeannette Weber, Duncan and Betsy Ross, Leslie Weber	Ross/Weber	2/6/2012	2.1, 1.5, 3.2, 4.13, 4.5, 3.3, 2.1, 20.1, 22.2
Leslie and Chris Weber	Weber	2/6/2012	20.8, 3.3, 3.2, 3.3, 2.1, 2.1, 4.8, 3.10, 4.2, 23.4, 4.2
Joyce B. Wells	Wells	1/12/2012	19.4
Steven Knecht	Gross Field Community Association (GFCA)	1/10/2012	24, 4.18, 4.19, 22.2, 2.6, 2.7, 2.1, 19.4
Susan Stompe	Stompe	1/10/2012	20.3, 2.1, 13.20, 14.3
Joyce Wells	Wells	1/10/2012	19.4
Jackie Bonner	Bonner	1/10/2012	1.5, 4.5, 4.13, 4.8, 3.3, 2.1, 20.1, 22.3



<b>NAME</b>	<b>ORGANIZATION (IF ANY)</b>	<b>DATE</b>	<b>COMMENT NUMBERS</b>
Christopher Gilkerson	Gilkerson	1/10/2012	1.6, 1.4, 20.1, 3.2, 3.3, 2.1, 4.14, 2.1/2.2,
Rob Pack	Pack	1/10/2012	1.3, 1.4, 19.5, 2.1, 1.2
Clarence Bracey	Bracey	1/10/2012	4.8, 4.13, 5.10, 5.1, 2.1, 4.8
Steven Nebb	Nebb	1/10/2012	1.5, 20.9, 20.9, 3.3, 20.11, 20.10, 20.1, 1.3, 1.7, 2.1, 4.8
Bob Spofford	Spofford	1/10/2012	2.1, 23.9
Patricia Capretta	Capretta	1/10/2012	2.1, 19.7, 4.5
Dr. Richard Levy	Levy	1/10/2012	4.5, 16.2
Rich Elb	Elb	1/10/2012	4.5, 19.4, 4.19
Kirk Heiser	Heiser	1/10/2012	4.22, 19.4, 4.9



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## **MASTER RESPONSE**

Many commenters on the Draft Environmental Impact Statement/Environmental Report (EIS/EIR) contend that the extension of Runway 13/31 at Gness Field Airport (DVO or Airport) from 3,300 feet to 4,400 feet would stimulate an increase in aircraft takeoffs and landings (operations or aviation activity) at the Airport. Many commenters assert that an 1,100 foot runway extension is longer than needed for the aviation fleet mix at DVO, and will result in the Airport being able to accommodate more and larger aircraft not currently able to use DVO. The commenters contend this change in the overall DVO aircraft fleet mix from smaller to larger aircraft would result in a significant increase in aircraft noise, particularly in the residential communities south of the Airport. In some cases the commenters stated that these residential neighborhoods are already significantly impacted by noise. The responses to these comments are provided below, and are referenced as part of the response to individual commenters.

### **TOPIC 1 – AVIATION FORECAST**

The Draft EIS/EIR Aviation Forecast underestimates future aviation activity at DVO because the extension of Runway 13/31 would stimulate an increase in aircraft takeoffs and landings (operations or aviation activity) not accounted for in the forecast.

### **TOPIC 1 – AVIATION FORECAST RESPONSE**

In general, forecasting general aviation demand entails combining historical activity with national and regional (local) trends, aircraft orders, and tenant/user input. General aviation demand combines several types of activity including personal, business, recreational, flight training, police/emergency services, and air taxi. Each of these types of activity is influenced differently by general economic conditions and specific items such as fuel prices. Population and business growth (or decline) in the region also influences the level of activity. Once regional demand is projected, where that demand will be served must be estimated. General aviation activity is served by a combination of commercial service airports, reliever airports, general aviation airports, heliports, and private facilities. Airport activity forecasts and airport fleet mix are not solely determined by or directly dependent upon the length of an airport's runway. While a 4,400-foot long runway could accommodate a different fleet mix than a 3,300-foot long runway; the length of the runway is only one factor that determines the types of aircraft that would use any given airport. At DVO, aviation activity is forecast to increase whether or not the runway is extended. Therefore, the length of a runway is not directly correlated to the level of aviation activity at DVO.

The Aviation Activity Forecast developed for the EIS (included as Appendix C, *Aviation Activity Forecast* to the documents) presents the forecast of aviation demand for DVO, which was developed to provide an analysis of historical activity at the Airport and as a basis for forecasting future activity levels. The forecast is "unconstrained" and as such does not take facility constraints or other outside limiting factors into consideration. In other words, for purposes of estimating



future demand, the forecast assumes facilities can be provided to meet the demand. Therefore the aviation activity forecast is not dependent on the existing or future characteristics (size, runway length, aircraft fleet mix, number of hangars, etc.) of the Airport, but on other factors within the region the DVO serves.

The forecast analysis is based on historic data and the underlying socio-economic conditions of the area, as well as consideration of the role that the Airport plays in the region. The forecast follows standard FAA forecast guidance included in the FAA's Office of Aviation Policy and Plans (APO), *Forecasting Aviation Activity by Airport*, dated July 2001. DVO is classified as a "Reliever Airport" by the FAA, which means that DVO is a high-capacity General Aviation (GA) airport in a metropolitan area. Reliever airports provide general aviation pilots with attractive alternatives to using congested commercial service airports and provide general aviation access to the surrounding area. DVO and other general aviation airports in the San Francisco Bay area designated as reliever airports serve to reduce congestion at San Francisco International Airport, Oakland International Airport, and San Jose International Airport. DVO exclusively serves GA and air taxi activity and does not have any scheduled commercial passenger air service. Typical GA activity includes recreational and flight training activities, business travel, news reporting, traffic observation, environmental surveys, police patrol, and emergency medical evacuations. Air taxi activity typically includes "for hire" aircraft chartered for specific trips on an on-demand basis. Air taxi operations are usually made up of larger GA aircraft, such as turboprop aircraft and an array of corporate jets.

The forecast includes an analysis of the GA demand in the geographic area that DVO serves. The number of aircraft based at DVO is forecast to increase by 1.4 percent annually from 2008 through 2027, regardless of runway length. The type of based aircraft at DVO is expected to follow national projections, which points towards a greater number of jet aircraft. In general, jet aircraft can be flown a greater distance before refueling and tend to provide more flexibility in terms of passenger/cargo loads. In addition, the market for privately owned propeller driven aircraft has been stagnant as the ability of people to purchase aircraft has decreased. The result is that most of the growth in the GA manufacturing market has been seen in corporate ownership, which tends to choose aircraft with jet engines.

Similarly, aircraft operations at DVO are forecast to increase from 85,500 operations in 2008 to 124,300 operations in 2027 representing an average annual growth rate of 2.0 percent. This growth is consistent with the FAA Aerospace Forecast Fiscal Years 2008-2025 which was the latest data available when the aviation activity forecasts for DVO were prepared. The FAA uses estimates of fleet size, hours flown, and utilization from the General Aviation and Air Taxi Activity and Avionics Survey (GA Survey) as baseline figures upon which assumed growth rates determined from local demand were applied. As discussed above, based aircraft are expected to trend more towards jet aircraft; however based aircraft are not directly correlated to the number of operations that are flown by each aircraft type. For example, an airport that has a flight school may have two or three small single-engine piston aircraft based at the airport. But, the number of daily operations by each of those training aircraft may be four or five



times the number of daily operations by a jet aircraft based at the airport. As a result, while aircraft operations are expected to increase, the operations are expected to be performed by the same or similar to the aircraft fleet that operates today and the percentage of operations by each aircraft category (single-engine piston, multi-engine piston, turbine, and helicopter) is assumed to remain unchanged throughout the forecast period.

The FAA has found that aviation activity increases and decreases as the United States and world economic activity increases and decreases. The FAA annually produces a national aerospace forecast report that forecasts aviation activity for a 20-year period<sup>1</sup>. These forecasts have found that fundamentally the demand for aviation is driven by economic activity. That is, aviation activity typically responds to economic demand rather than creates economic demand. The forecast for a specific airport, such as the DVO Aviation Activity Forecast included in Appendix C, *Aviation Activity Forecast* of this EIS, is influenced by the same economic factors as the national aerospace forecast.

Separate from this EIS, the Regional Airport Planning Committee, comprised of representatives of the Metropolitan Transportation Commission, the Bay Conservation and Development Commission, and the Association of Bay Area Governments, assessed the viability of San Francisco Bay area general aviation airports to provide scheduled passenger air service facilities to relieve congestion at San Francisco International Airport, Oakland International Airport, and San Jose International Airports. Their 2011 update of the *Regional Airport System Planning Analysis* found that DVO and other similar general aviation airports in the region would not have the air passenger demand to support scheduled passenger service. The region's general aviation airports do divert small aircraft traffic from the large airports with scheduled passenger air service. In doing so, they constitute an important part of the region's approach to mitigating runway congestion problems.<sup>2</sup>

As a public use airport, DVO is available to all aircraft that can be accommodated by its facilities. Although the Airport is classified as a B-I airport, and is designed for use by aircraft with a wingspan of less than 49 feet, and an aircraft approach speed of 91 to 120 knots, aircraft larger than the critical aircraft currently operate at the Airport and are expected to continue to do so in the future. Furthermore, these larger aircraft will likely continue to operate at DVO with or without implementation of Alternative B or Alternative D. Larger aircraft using DVO typically have limitations on their operating capabilities at DVO such as being limited below their full payload of passengers, cargo, or fuel, especially during takeoff, similar to the limitations on the critical aircraft for DVO, the Cessna 525.

It is possible owners or pilots who use one size of aircraft now, could choose to use larger size aircraft in the future if Alternative B or Alternative D is implemented. However, as FAA aerospace activity forecasting has found over many years of

<sup>1</sup> FAA Aerospace Forecasts at [www.faa.gov/about/office\\_org/headquarters\\_offices/apl/aviation\\_forecasts/](http://www.faa.gov/about/office_org/headquarters_offices/apl/aviation_forecasts/)

<sup>2</sup> Regional Airport System Planning Analysis 2011 Update, Volume 1: Final Report, prepared by Regional Airport Planning Committee (Metropolitan Transportation Commission, Bay Conservation and Development Commission, and Association of Bay Area Governments), September 2011.



evaluation that aviation activity increases in response to other types of economic activity, rather than creates other economic activity, it is more likely that the aircraft fleet mix at DVO already accurately reflects the local economic demand for aviation activity, including aviation user choices regarding their preferred size of aircraft. This is because those aviation users who prefer using DVO but require larger aircraft for a specific activity can still access DVO under current conditions by reducing their payload or fuel.

## **TOPIC 2 – RUNWAY LENGTH ANALYSIS**

Some commenters asserted that an 1,100-foot runway extension is longer than justified for the aviation fleet mix at DVO. Commenters stated that the required runway length for DVO was incorrectly calculated and that the purpose and need for the project on which the runway length analysis was based was unnecessarily narrow. Commenters also stated that the appropriate FAA guidance regarding determining runway length was not followed.

## **TOPIC 2 – RUNWAY LENGTH ANALYSIS RESPONSE**

In response to these comments Appendix D, *Runway Length Analysis* was reviewed. While the results of this review were to reconfirm that an 1,100-foot runway extension is justified, Appendix D, *Runway Length Analysis* has been clarified regarding why an 1,100-foot runway extension is justified, why the determination of runway length is consistent with FAA guidance, and provide additional clarification as to how the length of the proposed runway extension was established.

FAA Order 5090.3C, *Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)* identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the “critical aircraft” that will make “substantial use” of the airport in the planning period for improvements.

An aircraft is called the “critical aircraft” because it is the most “demanding” aircraft in terms of the physical dimensions of the airport such as the length and width of the runways and taxiways, and separation distance between runways and taxiways required for that aircraft to operate at the airport. “Substantial use” of a general aviation airport is defined as 500 or more annual itinerant operations. For DVO, the critical aircraft was determined to be the Cessna 525 business jet, and so the justified runway length for DVO was established based on the requirements of this aircraft. See Appendix D, *Runway Length Analysis*, Attachment 1, *Basis for Determination of the Critical Aircraft for DVO*, for more information regarding the designation of the Cessna 525 as the critical aircraft for DVO.

During the preparation of this EIS, FAA Advisory Circular (AC) 150/5325-4B, *Runway Length Requirements for Airport Design* was used to verify an appropriate runway length to meet the requirements of the critical aircraft at DVO. For airport



projects receiving Federal funding, the use of the methods described in FAA AC 150/5325-4B, *Runway Length Requirements for Airport Design* to determine runway length is mandatory. FAA AC 150/5325-4B Paragraphs 502 to 509 and FAA AC 150/5325-4B Table 5-1, identify eight specific variable factors that affect runway length that must be considered in determining the recommended runway length for an airport. These are:

- Airplane Type
- Flap Setting
- Operating Weights (for Takeoff and Landing)
- Airport Elevation
- Temperature
- Wind
- Runway Surface Conditions
- Difference in Centerline Elevation (i.e., is the runway level or does it slope from one end to the other producing uphill and downhill conditions).

For aircraft with a Maximum Certificated Takeoff Weight (MTOW) of 60,000 pounds or less, such as the critical aircraft for this project, the Cessna 525 business jet, FAA AC 150/5325-4B, Paragraph 202, *Design Approach*, provides two methods for considering the eight factors described above and additional factors to determine a recommended runway length. Airport planners can either use the appropriate “runway length curves” in FAA AC 150/5325-4B for the weight and characteristics of an individual critical aircraft or a “family grouping” of critical aircraft under consideration, or the airport planner can determine the necessary runway length from an airport planning manual (APM) for a specific critical aircraft.

Some Commenters reviewed the Draft EIS/EIR and concluded a 4,400-foot runway was excessively long. Some Commenters provided no basis for their conclusion while others stated that the Table 2-1 *Runway Length Curves* in FAA AC 150/5325-4B showed that only a shorter runway was necessary. Using the generalized runway length curves from Table 2-1 of the FAA AC 150/5325-4B is one of the two methods allowed by FAA AC 150/5325-4B to establish the necessary runway length for an airport.

However, because the Cessna 525 has a more demanding runway length requirement than what is shown for the B-I family grouping in Figure 2-1 *Runway Length Curves* of FAA AC 150/5325-4B, a specific APM for the Cessna 525 was used to establish the appropriate runway length for DVO. This alternative runway length calculation method allowed by FAA AC 150/5325-4B is more specific to the capabilities of a particular aircraft, in this case the critical aircraft for DVO, the Cessna 525. Therefore, the use of the APM for the Cessna 525 for the determination of runway length at DVO is preferable to use of the Table 2-1 of FAA AC 150/5325-4B because it establishes the necessary runway length based on the capabilities of the specific critical aircraft for DVO, the Cessna 525.



A summary of how the Cessna 525 APM was used to determine the necessary runway length for the runway at DVO to accommodate the Cessna 525 under hot weather and other adverse weather conditions is shown in Table 2-2 of Chapter Two, *Purpose and Need*, of the Final EIS. A detailed description of how the Cessna 525 APM was used to determine the necessary runway length for the DVO runway is included in Appendix D, *Runway Length Analysis*, of the Final EIS.

The existing runway at DVO is 3,300 feet long and as a result cannot fully accommodate the operations of the critical aircraft, the Cessna 525. Therefore, the purpose of the Sponsor's Proposed Project is to allow existing aircraft, as represented by the critical aircraft at DVO, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions. As described in Appendix D, *Runway Length Analysis*, of the Final EIS, an 1,100-foot runway extension of the existing 3,300-foot existing runway to provide a total runway length of 4,400 feet is necessary to meet the purpose and need of this project.

Some Commenters objected to the runway length determination for DVO because they considered it to be based on a purpose and need that had been defined too narrowly. However, the purpose and need for the Sponsor's Proposed Project is consistent with the FAA's guidance in FAA Order 5090.3C, *Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)* to provide the runway length that is appropriate for the critical aircraft that makes substantial use of an airport. Also FAA AC 150/5325-4B, Paragraph 103, identifies the design goal for the length of an airport's primary runway as "The design objective for the main primary runway is to provide a runway length for all airplanes that will regularly use it without causing operational weight restrictions." That is, the critical aircraft for an airport should be able to use the primary runway at that airport under all conditions without operational weight restrictions.

This EIS addresses accommodating the most demanding aircraft (i.e., the critical aircraft), which makes substantial use of DVO in hot weather and other adverse weather conditions. The proposed runway extension has not been designed to accommodate other larger aircraft with similar limitations because the FAA's guidance in FAA Order 5090.3C, *Field Formulation of the National Plan of Integrated Airport Systems*, is only to support development of additional aviation facilities to accommodate aircraft that make substantial use of an airport. In conclusion, the Sponsor's determination of runway length for this project is consistent with FAA guidance regarding how an airport's primary runway should be able to accommodate the critical aircraft at that airport.

### **TOPIC 3 – AIRCRAFT OPERATIONS AND NOISE LEVELS**

Many commenters contend the runway extension would result in changes in the overall DVO aircraft fleet mix from smaller to larger aircraft, which in turn would result in an increase in aircraft noise that should be considered a significant impact on the environment, particularly in the residential communities south of the Airport. In some cases the commenters stated that these residential neighborhoods are already significantly impacted by noise.



### **TOPIC 3 – AIRCRAFT OPERATIONS AND NOISE LEVELS RESPONSE**

As discussed under Topic Response 1 above, aviation activity at DVO is expected to increase whether or not a runway extension is constructed. The Draft EIS evaluated whether increases in noise under the No Action Alternative, Alternative B or Alternative D would represent a significant impact on the environment.

The determination of what noise level represents a significant noise impact on the environment has been the subject of extensive study. As described in Appendix E, *Noise*, nationally the FAA uses the noise metric identified by the Federal Interagency Committee on Noise (FICON) and the FAA *Report to Congress on the Effects of Aircraft Noise* to quantify potential noise impacts. Nationally, the noise metric used is Day/Night Average Sound Level (DNL). However in California, the FAA uses the noise metric Community Noise Equivalent Level (CNEL), which is similar to DNL, but assumes that aircraft noise during the hours of 7:00 P.M. to 10:00 P.M. is more annoying than aircraft noise between 7:00 AM and 7:00 PM. Both the DNL and CNEL noise metrics assume that noise between 10:00 PM and 7:00 AM is more annoying than noise between 7:00 AM and 7:00 PM.

Based on the extensive research and evaluation, the FAA uses the 65 decibel (dB) CNEL as the threshold of significant noise impacts in urban and residential settings such as those near DVO. A significant noise impact is considered to occur for an EIS alternative if the noise impact analysis for that alternative shows that noise sensitive areas would experience an increase in noise of CNEL 1.5 dB or more at or above CNEL 65 dB as compared to the No Action Alternative. As described above and in Appendix E, *Noise*, noise levels below CNEL 65 dB are defined as not significant. Noise levels must increase by 1.5 dB CNEL to be at or above 65 dB CNEL to be considered significant because the human ear cannot generally perceive changes in noise levels less than 1.5 dB CNEL. The FAA recognizes that particular individuals may be sensitive or, or annoyed by, noise below the CNEL noise significance thresholds. However, in accordance with FAA guidance and based on the findings of the FICON and subsequent FAA evaluation the FAA uses 65 dB CNEL noise metric as its threshold for determining significant noise impacts.

The FAA uses a computer model, the Integrated Noise Model (INM) to determine what areas on or adjacent to an airport experience noise levels of 65 dB CNEL or above. The results of that analysis for this EIS are provided in Chapter Five, *Environmental Consequences*, Section 5.1 and Appendix E, *Noise*. As discussed in Section 5.1, no noise sensitive areas, including the residential areas south of DVO, would be subjected to noise levels at or above 65 dB CNEL under the No Action Alternative, Alternative B, or Alternative D.

It seems a logical assumption that larger aircraft would be louder than smaller aircraft, but the reality is that this assumption is not always true. There are a number of factors that affect the noise level produced by an aircraft, including engine type (jet vs. propeller), age of the engine, shape of the airframe/wings, altitude, and distance from the receptor (person hearing the noise). These factors



have a much greater effect on aircraft noise levels than simply the size of the aircraft.

In the previous section, it was stated that the *critical aircraft* at DVO is the Cessna 525, which falls in the FAA's B-I design category. Although this is the design aircraft for planning purposes, it is certainly not the only aircraft that operates at DVO; nor is it the largest. Aircraft in larger design categories do operate at the Airport today; however, they are restricted in their ability to operate efficiently or to certain destinations due to the current length of the existing runway, as well as the runway width, pavement strength, and runway to taxiway separation. All of these play a part in a pilot's decision of where to operate an aircraft. Additional factors that pilots consider are the Airport's availability of services and parking options and the pilot's/passengers' need to access a particular area.

While there were concerns expressed about additional noise generated by the Sponsor's Proposed Project, the environmental analysis found that the project would not result in a significant increase in noise and there would be noise benefits associated with the runway extension to the north. Specifically, the extension to the north would allow aircraft to gain altitude quicker when departing to the south, which would allow them to either be higher when approaching noise sensitive areas to the south of the Airport, or to turn sooner to avoid the radio towers to the east. In either case, the northern extension of the runway provides an opportunity for a reduction in aircraft noise in those areas to the south of the Airport because departing aircraft would be farther away from people living in the area. As discussed above, distance from the aircraft is directly correlated to noise levels on the ground.

#### **TOPIC 4 – INDUCED OFF-AIRPORT GROWTH**

Many commenters suggested that extending the runway would induce off-airport growth and that this was not captured in the Draft EIS/EIR

#### **TOPIC 4 – INDUCED OFF-AIRPORT GROWTH RESPONSE**

DVO exclusively serves GA and air taxi activity and does not have any scheduled commercial passenger air service. The purpose of the Sponsor's Proposed Project is allow the existing aircraft, as represented by the critical aircraft, the Cessna 525, to operate at Maximum Gross Takeoff Weight under hot weather and other adverse weather conditions. Gness Field cannot become a commercial service airport with scheduled airline service, as a result of the proposed runway extension alone. The Airport would need to obtain a 14 CFR Part 139 certificate in order for DVO to become a commercial service airport with scheduled airline service. To obtain a certificate, an airport must agree to certain operational and safety standards and provide for such things as firefighting and rescue equipment. These requirements vary depending on the size of the airport and the type of flights available. If Marin County decides to apply for a Part 139 certificate a separate CEQA/NEPA document would be required.



Separate from this EIS, the Regional Airport Planning Committee, comprised of representatives of the Metropolitan Transportation Commission, the Bay Conservation and Development Commission, and the Association of Bay Area Governments, assessed the viability of San Francisco Bay area general aviation airports to provide scheduled passenger air service facilities to relieve congestion at San Francisco International Airport, Oakland International Airport, and San Jose International Airports. Their 2011 update of the *Regional Airport System Planning Analysis* found that DVO and other similar general aviation airports in the region would not have the air passenger demand to support scheduled passenger service. The region's general aviation airports do divert small aircraft traffic from the large airports with scheduled passenger air service. In doing so, they constitute an important part of the region's approach to mitigating runway congestion problems<sup>3</sup>

The Sponsor's Proposed Project is not intended or expected to cause an unforecasted growth in aircraft operations at DVO. Further, the Sponsor's Proposed Project would not involve additional expansion or extension of infrastructure facilities or roadways that could induce unplanned growth adjacent to DVO, nor is the Sponsor's Proposed Project anticipated to induce additional growth on vacant industrially zoned land near the Airport or other developable land in the region. Therefore, the environmental analysis found that the proposed runway extension would not result in an increase in forecasted airport operations or change in aircraft fleet mix beyond that anticipated for the No Action Alternative.

Implementation of Alternative A (No Action) will have no effect on the number of operations at DVO. Likewise, an 1,100-foot extension of the runway (Alternatives B and D) is unlikely to induce any increase in airport operations. The contribution of aviation infrastructure, such as runways, taxiways, apron area, and hangers, contribute at most only incidental growth in operations at an airport, unless the airport is already capacity constrained. This is not the case at DVO. National and regional economic cycles have much more of an effect on aircraft operations than aviation infrastructure.

Annually, the FAA produces a national aerospace forecast report that forecasts aviation activity for a 20-year period<sup>4</sup>. These forecasts have found the demand for aviation is driven by economic activity. That is, aviation activity typically responds to economic demand rather than creates economic demand. The forecast for a specific airport, such as the DVO Aviation Activity Forecast included in Appendix C, *Aviation Activity Forecast* of this EIS, is influenced by the same economic factors as the national aerospace forecast.

With regard to fleet mix, as a public use airport DVO is available to all aircraft that can be accommodated by its facilities. Although the Airport is classified as a B-I airport, (i.e., designed for use by aircraft with a wingspan of less than 49 feet and approach speeds of 91 to 120 knots), aircraft larger than the critical aircraft

<sup>3</sup> Regional Airport System Planning Analysis 2011 Update, Volume 1: Final Report, prepared by Regional Airport Planning Committee (Metropolitan Transportation Commission, Bay Conservation and Development Commission, and Association of Bay Area Governments), September 2011.

<sup>4</sup> FAA Aerospace Forecasts at [www.faa.gov/about/office\\_org/headquarters\\_offices/apl/aviation\\_forecasts/](http://www.faa.gov/about/office_org/headquarters_offices/apl/aviation_forecasts/)



currently operate at the airport and are expected to continue to do so in the future. Furthermore, these larger aircraft will likely continue to operate at DVO with or without implementation of Alternative B or Alternative D. Larger aircraft using DVO typically have limitations on their operating capabilities at DVO such as being limited below their full payload of passengers, cargo, or fuel, especially during takeoff, similar to the limitations on the critical aircraft for DVO, the Cessna 525.

It is possible owners or pilots who use one size of aircraft now, could choose to use larger size aircraft in the future if Alternative B or Alternative D is implemented. However, as FAA aerospace activity forecasting has found over many years of evaluation that aviation activity increases in response to other types of economic activity, rather than creates other economic activity, it is more likely that the aircraft fleet mix at DVO already accurately reflects the local economic demand for aviation activity, including aviation user choices regarding their preferred size of aircraft. This is because those aviation users who prefer using DVO but require larger aircraft for a specific activity can still access DVO under current conditions by reducing their payload or fuel.

In order to evaluate the potential environmental impacts of owners or pilots choosing to use larger aircraft at DVO as a result of implementing Alternative B or Alternative D, an analysis of air quality and noise impacts utilizing the 2023 forecast was prepared. The 2023 forecast included a higher level of demand and changes in fleet mix as compared to 2018. The EIS found that future growth in aviation activity would not result in significant impacts under 2023 operating levels in Section 5.1, *Noise* and Section 5.5, *Air Quality*. Therefore, even if construction of the runway extension resulted in increased aviation activity and changes in fleet that exceeded the level forecasted for DVO in 2018, it would not result in a significant impact associated with induced airport activity. As described in more detail in Section 5.4, implementation of Alternative A (No Action), Alternative B (Sponsor's Proposed Project), or Alternative D, would not result in significant secondary (induced) impacts.



**Table Q-1  
RESPONSE TO COMMENTS  
Gross Field Airport**

To ensure there is no misunderstanding by the reader, the general comment numbers by environmental topic are shown consecutively on the left column of this table. There are several environmental topics for which no public comments were received. These are marked "No Comment Received". These topics were included for completeness.

*Table begins on next page*



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>1</b>	<b>Purpose and Need</b>		
1.1	<p>Purpose and need is narrowly defined and all practicable alternatives were not considered. Elsewhere in the Draft EIS, the identified purpose is to provide the necessary runway length for existing users to more efficiently use the airport.</p>	USEPA	<p>Please see the Master Response, Topic 2 regarding the FAA requirements for airport improvements. Chapter Two, <i>Purpose and Need</i> of the Final EIS has been clarified to more clearly state Marin County's (Sponsor's) purpose and need for the project. The Sponsor's purpose and need for the project is to allow existing aircraft, as represented by the critical aircraft at DVO, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions.</p> <p>The FAA's statutory mission and purpose and need is to ensure the safe and efficient use of navigable airspace in the U.S. The FAA must ensure that the Sponsor's Proposed Project does not derogate the safety of aircraft and airport operations at DVO.</p> <p>The FAA's purpose and need is consistent with FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i>, which identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements.</p> <p>The Appendix D, <i>Runway Length Analysis</i> in the Final EIS has been clarified regarding the required runway length for the critical aircraft. The runway length analysis concluded a total runway length of 4,400 feet is required for the critical aircraft, the Cessna 525. Project alternatives that do not provide for a total runway length of 4,400 feet do not meet the purpose and need for this project and are not prudent and reasonable. Alternatives that are not prudent and reasonable do not need to be evaluated in detail in the Final EIS.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1.2	Purpose of the project is to make \$\$\$	Robert Pack	<p>Comment Noted. Please see the Master Response, Topic 2 regarding the FAA requirements regarding the purpose and need for airport improvements. Chapter Two, <i>Purpose and Need</i> of the Final EIS has been clarified to more clearly state Marin County's (Sponsor's) and the FAA's purpose and need for the project. The Sponsor's purpose and need for the project is to allow existing aircraft, as represented by the critical aircraft at DVO, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions.</p> <p>The FAA's statutory mission and purpose and need is to ensure the safe and efficient use of navigable airspace in the U.S. The FAA must ensure that the Sponsor's Proposed Project does not derogate the safety of aircraft and airport operations at DVO.</p>
1.3	Error saying majority of fleet cannot operate during standard and hot weather on 3,300 feet, only benefits small percentage (1%). Final EIS should identify the number and percentage of aircraft flights that would benefit from the extension.	USEPA, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Robert Pack, Steven Nebb	<p>Chapter Two, <i>Purpose and Need</i> of the Final EIS has been clarified to explain that the Sponsor's and FAA's purpose and need is consistent with FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i>, which identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements. References to possible benefits to other aircraft that are not the critical aircraft have been removed from the Final EIS.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1.4	Pilots should just adjust their operations (less fuel and passengers) to account for less runway	Robert Pack, Christopher Gilkerson	The approach proposed in this comment is inconsistent with FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i> , regarding the development of facilities at airports in the NPIAS. The FAA guidance is that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements. However, aircraft that occasionally use DVO that are more demanding than the Cessna 525, the critical aircraft for DVO in terms of runway length, have and will continue to adjust their operations to reduce their payload of fuel and passengers when needed in order to operate at DVO.
1.5	Support of all elements of project with exception of 1,100 foot Extension	Dr. Richard Levy, Rosario Carr- Casanova, Jeanette Weber, Duncan & Betsy Ross, Jacqueline Bonner, Steven Nebb	Comment noted.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1.6	What is the real purpose of the extension	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	<p>The commenter seems to be suggesting that FAA and Marin County are not disclosing the true reason for the Sponsor's Proposed Project. As stated in Chapter Two, <i>Purpose and Need</i> of the Final EIS the Sponsor's purpose and need for the project is to allow existing aircraft, as represented by the critical aircraft at DVO, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions.</p> <p>The FAA's statutory mission and purpose and need is to ensure the safe and efficient use of navigable airspace in the U.S. The FAA must ensure that the Sponsor's Proposed Project does not derogate the safety of aircraft and airport operations at DVO.</p> <p>The Sponsor's and FAA's purpose and need is consistent with FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i>. The FAA guidance is that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1.7	There would not be a weight restriction on the critical aircraft during standard days/On hot days the critical aircraft could service the west coast	Steven Nebb	FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i> , identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements. Appendix D, <i>Runway Length Analysis</i> explains in more detail why the appropriate runway length for DVO is 4,400 feet, which accommodates the critical aircraft, the Cessna 525 under hot weather and other adverse weather conditions. The commenter's suggestion is inconsistent with this guidance on airport dimensional standards and would not meet the purpose and need of the project.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
1.8	The Purpose & Need is based on outdated objective from the Master Plan	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	<p>The purpose of the Sponsor's Proposed Project is to allow existing aircraft, as reflected by the critical aircraft at DVO, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions. A runway length analysis was completed in 2008, prior to Public Scoping for the EIS and EIR, to determine the runway length necessary to meet this purpose and need. While the Marin County Aviation Commission Resolution No. 97-1: <i>A Resolution Adopting Chapter 6.0 Airport Development Program Update 1997</i><sup>1</sup> identified a runway extension as part of DVO's future development program and a proposed runway length was developed as part of the 2002 Gnos Field Preliminary Design Report<sup>2</sup>, the preparation of the runway length analysis for this EIS was based on the purpose and needed identified in this document. The purpose and need was not based on an objective from the 1989 Airport Master Plan. This runway length analysis is provided in Appendix D, <i>Runway Length Analysis</i> in Volume 3.</p>

<sup>1</sup> Marin County Aviation Commission Resolution No. 97-1: *A Resolution Adopting Chapter 6.0 – Airport Development Program Update 1997 – Marin County Airport Master Plan (Gnos Field) and Recommendation of Approval of Chapter 6.0 1997 Update to the Marin County Board of Supervisors, February 5, 1997.*

<sup>2</sup> Cortright & Seibold, *Preliminary Design Report, Runway Extension, Gnos Field*, 2002.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>2</b>	<b>Forecasts</b>		
2.1	The runway extension = larger/more aircraft at DVO	USEPA, Marin Audubon Society, Marin Conservation League, Gness Field Community Association, Black Point Improvement Club, Dr. Richard Levy, Rosario Carr-Casanova, Leslie & Chris Weber, Jeanette Weber, Duncan & Betsy Ross, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Anthony & Lorraine Silveira, Robert Pack, Jacqueline Bonner, David Donadio, Steven Nebb, Steve Knecht on behalf of Gness Field Community Association, Clarence Bracey, Bob Spofford, Patricia Capretta	See the Master Response, Topic 1.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
2.2	Basis for projected aircraft types in the forecast needs to be explained	Marin Audubon Society, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	Appendix D, <i>Runway Length Analysis</i> includes information in Attachment 1, which explains the basis for the projected aircraft types included in the aviation forecast.
2.3	What is the accuracy of the forecasts and accuracy of past forecasts	Marin Audubon Society, Black Point Improvement Club	Forecasts of aviation activity are based on historic activity, combined with projections of underlying socio-economic conditions for the airport service area (Marin County). The results of the forecast are projections of aircraft operations in the future. As with all projections, this forecast is an estimate. However, because it was prepared using industry standard methodologies and was based on the best available data regarding local and national trends in aviation, it is a reasonable projection of activity at the Airport. Appendix C, <i>Aviation Activity Forecast</i> , provides a detailed discussion of the background data used in the forecast. Master Response, Topics 1 and 3 provide additional information about how the forecast relates to noise levels. For the Sponsor's Proposed Project in the Final EIS the need is based on existing aircraft demand (see Chapter Two, <i>Purpose and Need</i> ). To establish the exact number of annual aircraft operations at DVO would require that the airport have an airport traffic control tower that is manned 24 hours per day, seven days a week. As DVO does not have such a control tower the exact accuracy of the aviation forecast in relation to actual operations is not known.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
2.4	Are there FAA regulations that can limit operations at DVO	Marin Audubon Society	Airports that accept Federal Airport Improvement Program funding such as DVO must adhere to certain Federal grant assurances, including Grant Assurance 22, Economic Nondiscrimination, which requires sponsors to make the airport available on reasonable terms and without unjust discrimination. Moreover, the Airport Noise and Capacity Act of 1990 requires airport sponsors seeking to establish aircraft noise and aircraft access restrictions to a specific airport to follow the FAA regulations at 14 CFR Part 161 (Part 161) <i>Notice and Approval of Noise and Access Restrictions</i> . Part 161 provides airports with a methodology to place limits on aircraft types and/or other restrictions, primarily for the purpose of reducing noise impacts. The methodology for an airport conducting a Part 161 is arranged as a cost-benefit analysis, where the benefit is the amount of money not spent to mitigate significantly noise-impacted land uses is weighed against the cost, which is the potential reduction in revenue and interstate commerce that would occur as the result of a restriction being placed at an airport. As no significant noise impacts have been identified in the Final EIS under the Sponsor's Proposed Project or the No Action Alternative, there is not currently a basis for restricting aircraft access to DVO to reduce noise (see Chapter Five, <i>Environmental Consequences</i> , Section 5.1, <i>Noise</i> ).
2.5	Provide further discussion of based aircraft (growth in number of operations, adequate facilities, increase in desirability of DVO, etc.)	Marin Audubon Society	See Master Response, Topic 1.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
2.6	A runway extension does not mean commercial/airlines at DVO	Gross Field Community Association, Steve Knecht on behalf of Gross Field Community Association	Comment noted. DVO is a reliever airport that accommodates General Aviation operations. There are no scheduled commercial service operations at DVO, nor are any proposed at this time. In order to accommodate air carrier operations, Marin County as the airport sponsor would have to apply for and receive a Part 139 certificate under 14 CFR Part 139, <i>Certification of Airports</i> . Marin County could apply for a Part 139 certificate whether or not the runway is extended at DVO. A specific runway length does not establish or eliminate the ability of an airport sponsor to obtain a Part 139 certificate to allow scheduled commercial service operations at a particular airport. However, the County has not indicated any intention of applying for a Part 139 certificate, nor has an air carrier expressed an interest in provided scheduled commercial service to DVO.
2.7	There will be an increase in operations at the airport with or without extension if demand is there	Steve Knecht on behalf of Gross Field Community Association	Comment noted. The analysis in the EIS concurs with this statement.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>3</b>	<b>Alternatives</b>		
3.1	Alternatives are too narrowly defined due to purpose and need	USEPA	<p>Please see Master Response, Topic 2 regarding the requirements the FAA must follow regarding the purpose and need for airport improvements. Chapter Two, <i>Purpose and Need</i> of the Final EIS has been clarified to more clearly state Marin County's (Sponsor's) and the FAA's purpose and need for the project. The Sponsor's purpose and need for the project is to allow existing aircraft, as represented by the critical aircraft at DVO, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions.</p> <p>The Sponsor's and FAA's purpose and need is consistent with FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i> which identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements.</p> <p>The Appendix D, <i>Runway Length Analysis</i> in the Final EIS has been clarified regarding the required runway length for the critical aircraft. The runway length analysis concluded a total runway length of 4,400 feet is required for the critical aircraft, the Cessna 525. Project alternatives that do not provide for a total runway length of 4,400 feet do not meet the purpose and need for this project and are not practicable. Alternatives that are not practicable do not need to be evaluated in detail in the Final EIS.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
3.2	Recommend evaluating shorter runway extension alternative	USEPA, Dr. Richard Levy, Rosario Carr-Casanova, Leslie & Chris Weber, Jeanette Weber, Duncan & Betsy Ross, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Jacqueline Bonner, Steven Nebb	This comment is addressed in Master Response, Topic 2 – Runway Length Analysis Response.
3.3	Include a 3,500/3,600/3,700/ 3,800 ft. runway extension alternative	Dr. Richard Levy, Rosario Carr-Casanova, Leslie & Chris Weber, Jeanette Weber, Duncan & Betsy Ross, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Jacqueline Bonner	This comment is addressed in Master Response, Topic 2 – Runway Length Analysis Response.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
3.4	Off-site airport alternatives should look at 4,000 ft. runway rather than 4,400 ft.	USEPA	This comment was based on the Appendix D, <i>Runway Length Analysis</i> of the Draft EIS, which discussed considering local conditions to establish that a 4,400-foot runway at DVO was needed instead of a 4,000-foot runway. The Appendix D, <i>Runway Length Analysis</i> in the Final EIS has been clarified regarding the required runway length for the critical aircraft. The runway length analysis concluded a total runway length of 4,400 feet is required for the critical aircraft, the Cessna 525. Project alternatives that do not provide for a total runway length of 4,400 feet do not meet the purpose and need for this project and are not prudent or reasonable. Alternatives that are not prudent or reasonable do not need to be evaluated in detail in the Final EIS.
3.5	More information on who uses DVO, where they are located, and who can use airport should be included in the EIS/EIR with and without the extension	USEPA, Steven Nebb	The best available information related to these topics can be found in Appendix C, <i>Aviation Activity Forecast</i> and Master Response, Topic 1.
3.6	Include the location of the new channel/canals on maps	California Department of Fish & Game, Marin Audubon Society	Exhibits 2-2 and 3-3 in the Final EIS show the location of the proposed levee and channel/canal features for the Sponsor's Proposed Project, Alternative B. Exhibit 3-5 shows the location of the proposed levee and channel/canal features for Alternative D.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
3.7	Agree Alt. C most environmentally damaging alternative	Marin Audubon Society, USEPA	This commenter is restating the conclusion in the Chapter Three, <i>Alternatives</i> of the Final EIS, that extending Runway 13/31 by 1,100 feet to the south as considered in Alternative C is more environmentally damaging than implementing either Alternative B or Alternative D. Alternative C is more environmentally damaging because it has greater impacts on endangered species habitat and wetlands than either Alternative B or Alternative D. Alternative C was not evaluated in detail in the Final EIS.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
3.8	<p>The status of the lands on which the cross wind-runway would have been constructed should be discussed. A second runway design extending to the northeast and southwest was planned for more than 20 years. These lands were specifically excluded by Fish and Game when they acquired the adjacent lands. The current status of this proposal should be discussed. Does the county still own this parcel? What is the potential for this design to be resurrected? Because it is not in the current expansion design, the County should consider transferring the strip to the owner of the adjacent land, the Department of Fish and Game.</p>	Marin Audubon Society	<p>The Gness Field Airport Master Plan does include a crosswind runway as a long term recommendation. The County has not purchased, and does not own land for a crosswind runway (Exhibit 1-2 in Chapter One, <i>Background</i> of the Final EIS display the Airport's current property boundary). Instead of constructing a crosswind runway, the County widened the existing runway between 1997 and 2001 from 60 feet to 75 feet to address concerns about crosswinds at the Airport.</p>
3.9	3,500 ft. runway meets requirements for B-I	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Jacqueline Bonner	<p>This comment is addressed in Master Response, Topic 2 – Runway Length Analysis Response.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
3.10	4,400 ft. runway is for 10+ passenger aircraft	Leslie & Chris Weber, Jacqueline Bonner	See Master Response, Topic 2, and Appendix D, <i>Runway Length Analysis</i> . The runway length of 4,400 was based on the critical aircraft, the Cessna 525. The Cessna 525 is typically designed to seat up to 9 passengers and 1 pilot.
3.11	Support of RSA improvements	Robert Pack	Comment noted.
3.12	Oakland North Field should be included as an off-site alternative	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	As noted in Section 3.3.1 of Chapter Three, <i>Alternatives</i> , of the Final EIS the use of OAK is not considered a prudent or reasonable alternative to the Sponsor's Proposed Project at DVO. OAK prohibits the full range of general aviation flight activities that designated general aviation airports allow, such as flight training activities. Also, OAK is located approximately 50 miles by road from DVO, and the alternative driving routes between DVO and OAK include either the Golden Gate Bridge and San Francisco-Oakland Bay Bridge, or the Richmond- San Rafael Bridge, and the often heavily congested Interstate 80 and Interstate 880 freeways. This combination of factors is sufficient to exclude the OAK North Field from detailed consideration as an alternative to the Sponsor's Proposed Project.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
3.13	Extending the Petaluma Municipal Airport runway should have been considered as an alternative	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	As discussed in Section 3.3.1 of Chapter Three, <i>Alternatives</i> , of the Final EIS, Petaluma Municipal Airport (O69) has one 3,600 foot runway. The current Airport Layout Plan (ALP) on file with FAA does not indicate a proposed long term runway extension at O69. Other factors that reduce the feasibility of this option include environmental considerations. Relocating operations from DVO to Petaluma Municipal Airport would result in longer automobile commutes for people located south of DVO, which is the primary population area served by DVO. As a result of longer commutes, an increase in air emissions would occur along the Highway 101 corridor. Therefore, a runway extension at O69 would not address the needs of DVO, is not a reasonable, feasible, prudent, or practicable alternative to the Sponsor's Proposed Project, and was not carried forward for more detailed environmental analysis.
<b>4</b>	<b>Noise</b>		
4.1	Has the increase in noise over homes in Petaluma been considered	City of Petaluma	The noise analysis included in the Final EIS evaluated noise over all communities near the Airport, including Petaluma. Section 5.1 in Chapter Five, <i>Environmental Consequences</i> , concluded that noise-sensitive land uses, including residential land uses in Petaluma, would not be exposed to noise levels exceeding 65 CNEL from aircraft operating at DVO. As such, no significant noise impacts would occur in Petaluma as a result of the Sponsor's Proposed Project or any of its alternatives.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.2	Re-evaluate the noise impacts with new forecast for runway extension (i.e. use by larger aircraft)	USEPA, Marin Conservation League, Leslie & Chris Weber, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	The noise analysis for Final EIS was prepared in accordance with FAA Orders 1050.1E and 5050.4B. The activity levels and fleet mix used in the noise analysis were prepared as part of the aviation forecast and are reasonable projections of future activity at the Airport. There is no requirement for assessing a speculative 'worst case scenario'. The Council on Environmental Quality (CEQ) guidelines state that when considering situations where specific information is unknown (like predicting future aviation activity), the Final EIS therefore makes a reasonable assessment of project impacts instead of analyzing a worst case scenario. See Master Response, Topic 3 for more discussion of forecasts and the relationship to noise levels around the Airport.
4.2a	The current analysis of noise level and environmental impact is inadequate. It fails to consider the impact of the larger jet usage once the runway is extended. The purpose of the analysis should be to try and determine the worst case scenario so that any noise level disturbances can be appropriately mitigated. Since two current airport users state that they will purchase and use larger airplanes at Gness Field with a longer runway, a proper noise analysis must be done.	Steven Nebb, Christopher Gilkerson	The noise analysis for the Final EIS was prepared in accordance with Federal. The activity levels and fleet mix used in the noise analysis were prepared as part of the aviation forecast and are reasonable projections of future activity at the Airport. There is no requirement for assessing a speculative 'worst case scenario'. The Council on Environmental Quality (CEQ) guidelines state that when considering situations where specific information is unknown (like predicting future aviation activity), the Final EIS therefore makes a reasonable assessment of project impacts instead of analyzing a worst case scenario. See Master Response, Topic 3 for more discussion of forecasts and the relationship to noise levels around the Airport.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.3	Noise measurements were only conducted for a short duration	City of Novato, Marin Conservation League	The noise analysis included in the Final EIS was conducted in accordance with FAA Orders 1050.1E and 5050.4B, which the development of noise exposure contours using the FAA-approved Integrated Noise Model (INM). While not required by FAA for developing noise contours, a noise measurement program was conducted to collect and calculate a sample of aircraft events and background noise levels for verifying inputs in the INM modeling. The noise measurement program included six long-term sites where measurements were taken for several days and twenty short-term sites where measurements were taken for one hour each. The duration and times of day in which the noise monitoring was conducted was sufficient to achieve its intended purpose and followed FAA guidance on conducting noise measurement programs. See Appendix E, <i>Noise</i> for more information on the noise measurement program.
4.4	Noise measurement maps incorrect	City of Novato	In Table 4-2 of the Draft EIS, the addresses for measurements sites S12 and S13 were transposed. These addresses have been placed in their correct locations in Table 4-2 of the Final EIS and Final EIR. Exhibit 4-6 was not updated as it correctly showed the locations of the measurement sites.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.5	Enforce noise abatement procedures/Noise abatement procedures not being followed/airport staff not responsive	Marin Conservation League, Black Point Improvement Club, Dr. Richard Levy, Rosario Carr-Casanova, Jeanette Weber, Duncan & Betsy Ross, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Jacqueline Bonner, David Donadio, Patricia Capretta, Rich Elb	Gnoss Field has voluntary noise abatement procedures in place that are designed to reduce noise, in particular for the communities located directly south of the Airport. The Voluntary Noise Abatement Procedures are posted at the DVO run up area. The noise abatement procedures are routinely shared with the pilot community at DVO through normal information distribution, the Airport Facilities Directory as well as on the Automated Weather Observation System notifications. The majority of pilots follow these procedures. When a noise complaint is logged at the Airport, staff will update their folder with complaints received by phone and internet. The folder will contain date and time of the complaint and when possible, aircraft type, pilots name and any follow up comments. On those occasions where the pilot is still at the airport when the complaint is filed, the pilot is contacted immediately. The Airport manager contacts pilots who operate inconsistently with the noise procedures. However, it should be noted that noise abatement procedures are voluntary and there are times when the procedures cannot be flown due to abnormal operating conditions such as unusual wind direction, limited visibility, other weather conditions, or conflicting air traffic.
4.6	Will there be a change in flight patterns	Marin Audubon Society	Each of the development alternatives evaluated in the Final EIS (Alternatives B, C, and D) would result in changes to existing flight patterns. For the Sponsor's Proposed Project, the changes to flight patterns would occur north of the Airport for aircraft approaching to land on Runway 13. Some pilots commented at the Public Hearing that with the Sponsor's Proposed Project they may be able to turn left earlier when departing Runway 13 to the south and thereby reduce noise impacts on the Bahia area. While this may be true, for the purposes of the Final EIS noise analysis it was assumed that the flight pattern would stay in the same general location as they are today.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.7	Discuss the impact from endangered species due to noise from construction and discuss under mitigation	Marin Audubon Society	The potential environmental impacts of Alternative A, Alternative B, and Alternative D on endangered species, including noise impacts, are discussed in Section 5.9 of the EIS.
4.8	Bigger planes=more noise	Leslie & Chris Weber, Christopher Gilkerson, David Donadio, Jacqueline Bonner, Clarence Bracey, Steven Nebb	See Master Response, Topic 3.
4.9	Runway extension = reduction in noise to the south of DVO	Charles Roell, Jim Duckworth, Kirk Heiser	FAA agrees with this comment. As discussed in Appendix E, <i>Noise</i> , the proposed extension of Runway 13/31 to the Northwest by 1,100 Feet (Alternative B) or by 860 feet (Alternative D), would shift the 65 CNEL noise contour to the northwest slightly as a result of the reduced influence in departure noise from Runway 13 departures. This reduction is due to the slightly higher altitudes for departures and the slight northwestward shift in the Runway 13 departure turn to the east.
4.10	Include the noise levels of aircraft that can use 4,400 foot runway	Wright Bass	See Master Response, Topic 3.
4.11	Publish the noise abatement procedures near run-up areas and in airport directory	Wright Bass	The voluntary noise abatement procedures are posted in the run-up areas and the Airport Facility Directory.
4.12	Monitor noise and pilots in communities	Wright Bass	Comment noted.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.13	Runway extension = noise impacts	Dr. Richard Levy, Rosario Carr- Casanova, Jeanette Weber, Duncan & Betsy Ross, Christopher Gilkerson, Jacqueline Bonner, Clarence Bracey	A noise analysis was conducted for the Final EIS using FAA methodologies and thresholds for determining impacts. No significant noise impacts would result from the Sponsor's Proposed Project based on Federal noise impact thresholds. See Master Response, Topic 3 for more discussion of forecasts and the relationship to noise levels around the Airport.
4.14	Noise analysis flawed because sketchy radar data & interviews were used	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	The noise analysis for the Final EIS was conducted according to Federal guidelines, which requires the evaluation of average-annual conditions presented using the Community Noise Equivalency Level (CNEL) metric. FAA methodologies for collecting and incorporating radar data and other input data were followed. Therefore, the noise analysis satisfies all Federal requirements.
4.15	Calculation of noise impacts doesn't include overflights as described in text	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	The noise analysis for the Final EIS was conducted according to Federal requirements, which require the evaluation of average-annual conditions presented using the Community Noise Equivalency Level (CNEL) metric. Noise abatement procedures have been published at DVO to minimize the disturbance caused by individual aircraft operations. It is recognized that individual pilots may not follow those procedures for a variety of reasons. However, the Sponsor's Proposed Project would not require, encourage, or imply that pilots should not utilize the noise abatement procedures.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.16	What are the impacts to livestock (breaking fence, unproductive dairy)	Anthony & Lorraine Silveira	The property in question is currently subject to aircraft overflights from operations at DVO, which will continue with or without the proposed runway extension. The mode of operation where aircraft would be closer to the Silveira's farm would be aircraft arrivals from the north on Runway 13. In this case, however, aircraft are much quieter than when departing. There is no conclusive scientific evidence indicating that the type of aircraft and noise levels anticipated at DVO, with or without the project, would result in stampeding or a reduction in milk production.
4.17	Decibels (approach) FAR 36 noise levels: C525 (CJ+) 82 dBA. Beechjet dBA 91 dBA. LearJets 90-100 dBA. Sabreliner 95 dBA.	Steven Nebb	The Commenter has correctly identified single event noise levels from 14 CFR Part 36 - <i>Noise Standards: Aircraft Type And Airworthiness Certification</i> for several specific aircraft. However, as explained in detail in Section 5.1 of Chapter 5, <i>Environmental Consequences</i> of the Final EIS, and Master Response, Topic 3, the Community Noise Equivalent Level is the noise metric used to determine whether a significant noise impact to a sensitive noise receptor is occurring, not single aircraft event noise levels. Furthermore, as discussed in Section 5.1 of Chapter Five, <i>Environmental Consequences</i> of the Final EIS, implementation of either Alternative B or Alternative D would not result in a significant noise impact.
4.18	The runway extension ≠ noise impact, but reduction in noise	Gnoss Field Community Association, Gnoss Field Community Association, Steve Knecht on behalf of Gnoss Field Community Association	FAA agrees with this comment. As discussed in Appendix E, <i>Noise</i> , the proposed extension of Runway 13/31 to the Northwest by 1,100 Feet (Alternative B) or by 860 feet (Alternative D), would shift the 65 CNEL noise contour to the northwest slightly as a result of the reduced influence in departure noise from Runway 13 departures. This reduction is due to the slightly higher altitudes for departures and the slight northwestward shift in the Runway 13 departure turn to the east.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
4.19	Include the higher altitude of aircraft, the change in location of turns, & reduced power the aircraft with the extension when departing to the south	Gnoss Field Community Association, Steve Knecht on behalf of Gnoss Field Community Association, Rich Elb	The commenters, who represent pilots at DVO, have stated that with the Sponsor's Proposed Project they may be able to turn left earlier when departing Runway 13 to the south and thereby reduce noise impacts on the Bahia area. While this may be true, for the purposes of the Final EIS noise analysis it was assumed departures would stay in the same general location as they are today. However, the noise modeling did take into account higher altitudes for aircraft departing to the south. Aircraft taking off to the south on Runway 13 would start their takeoff roll approximately 1,100 feet (Alternative B) or 860 feet (Alternative D) farther to the northwest than they currently do and thus be somewhat higher south of the Airport as they initiate their turns. These factors were included in the INM noise modeling that was prepared for this EIS.
4.20	There will be less noise for birds in the marsh restoration project	Gnoss Field Community Association	Comment noted.
4.21	Noise mitigation measures should be included (prohibit landing from the south)	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	The noise analysis included in the Final EIS evaluated noise levels around the Airport. Section 5.1 in Chapter Five, <i>Environmental Consequences</i> , concluded that noise-sensitive land uses, including residential land uses, would not be exposed to noise levels exceeding 65 CNEL from aircraft operating at DVO. No significant noise impacts and no mitigation would be required as a result of the Sponsor's Proposed Project or any of its alternatives.
4.22	No noise issues with DVO	Kirk Heiser	Comment noted.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>5</b>	<b>Land Use</b>		
5.1	Include Bird-aircraft strike discussion & if they will increase or decrease	USEPA, California Department of Fish & Game, Marin County, Marin Audubon Society, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Clarence Bracey	Discussion of the Redwood Landfill is included in Section 5.9 of the Final EIS. The Redwood Landfill (RLI) currently operates under a permit from Marin County Environmental Health Services, which was designated by the California Integrated Waste Management Board as the solid waste Local Enforcement Agency. This permit includes responsibilities of the landfill that include measures to reduce bird attractants. There have been no reported incidents of bird strikes associated with the RLI. With the current measures in place, it is not anticipated that there would be an increase in bird strikes due to implementation of the Sponsor's Proposed Project.
5.2	Mitigation for increased bird strikes should not be the responsibility of RLI but DVO	Redwood Landfill, Marin County	Discussion of the Redwood Landfill is included in Section 5.9 of the Final EIS. Redwood Landfill (RLI) currently operates under a permit from Marin County Environmental Health Services, which was designated by the California Integrated Waste Management Board as the solid waste Local Enforcement Agency. This permit includes responsibilities of the landfill that include measures to reduce bird attractants. No significant impacts associated with increased bird strikes on aircraft from the Sponsor's Proposed Project, were identified in the Final EIS, particularly in light of these on-going bird strike mitigation measures in place at RLI. Therefore, no mitigation was suggested above the continuance of the measures already identified and required in RLI's operating permit. Implementation of the measures, required by RLI's permit to operate the landfill, are the responsibility of RLI, not DVO.
5.3	Change word 'avigation' to 'navigation' on page 4-25, first paragraph, third sentence	County of Marin – Community Development Agency (MARIN)	"Avigation" easement is the correct term for easements associated with the overflight of properties or restrictions on the height of structures as related to the operation of aircraft. The term "avigation" is correctly used.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
5.4	Change the word 'Law' to 'Local' on page 2-23, Table 2-2, Environmental Impact 4.2-4, third Mitigation Measure	County of Marin – Community Development Agency (MARIN)	This comment is specific to a paragraph of the Marin County EIR that was not included in the Draft EIS, so this comment is not applicable to the EIS.
5.5	Add further discussion of lot line adjustment (who will it affect and how)	Marin Audubon Society	The Final EIS (Section 5.2) describe in detail the lot-line adjustment (property acquisition). The property owner is JHW Limited Partners.
5.6	What is FAA guidance on mitigating bird strike hazards? The Reports should address the issue of potential and hazardous air strikes with wildlife.	Marin Audubon Society, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	The FAA AC 150/5200-33, <i>Hazardous Wildlife Attractants on or Near Public Use Airports</i> , provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. Section 5.9 of the Final EIS was expanded to discuss the Redwood Landfill (RLI), FAA guidance on bird strikes, and the measures in place to reduce the potential for bird strikes.
5.7	In Compatible Land Use discussion include description of surrounding wetlands and habitat areas	Marin Audubon Society	Wetlands and wildlife areas are defined and impacts discussed in the Final EIS. Section 4.9 and Section 5.9 of the Final EIS discuss the location of wildlife habitats in the project area. These sections describe and quantify the wetland and wildlife habitats, identify the potential impacts of the Sponsor's Proposed Project, and list viable mitigation measures to reduce the significant impacts of the project on these natural resources.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
5.8	Specific zoning not included in analyzing impacts in the future	Anthony & Lorraine Silveira	The property referenced by the commenter lies between the SMART railroad track and Highway 101, northwest of DVO property. These parcels are largely contained within the Baylands Corridor as defined in the Marin Countywide Plan. Within this corridor, Marin County severely limits development, giving preference to wetland and wildlife habitats (see Policy BIO-5 in Marin Countywide Plan). There are small portions of these parcels that are located outside the Bayland Corridor, but within the Inland-Rural Corridor. While this area is less restrictive, future development on these portions of the commenter's parcels would be required to be consistent with airport operations because of County land use assurances provided to the FAA. Appendix O, <i>Land Use Assurance Letter</i> of the Final EIS includes a letter from the Marin County Community Development Agency stating that "the County of Marin provides assurance that appropriate action and enforcement of zoning laws has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the vicinity of Gness Field Airport to activities and purposes compatible with normal airport operations."
5.9	Suggested language to account for additional bird control measures	Redwood Landfill	Section 5.9 of the Final EIS discusses the Redwood Landfill (RLI) and states that RLI currently operates under a permit from Marin County Environmental Health Services, which was designated by the California Integrated Waste Management Board as the solid waste Local Enforcement Agency. This permit includes responsibilities of the landfill that include measures to reduce bird attractants. The Final EIS did not identify significant impacts associated with the Sponsor's Proposed Project, particularly in light of these on-going measures in place at RLI. Therefore, no mitigation was suggested above the continuance of the measures already identified and required in RLI's operating permit.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
5.10	The runway extension will cause a decline in property values	Clarence Bracey	Property values are affected by a variety of factors, such as national and local market conditions, availability of financing, availability of similar housing, and are not controlled by one factor such as noise levels. For noise levels below 60 CNEL, like those experienced at the nearest residential uses to the Airport, there is no known correlation between aircraft noise and property values.
<b>6</b>	<b>Socioeconomic</b>		
6.1	Are the population projections used to support the Purpose & Need	City of Novato	Population projection data is not directly used to support the purpose and need. The population projections were presented to identify growth trends and disclose the potential for secondary (induced) impacts based on estimates of population growth in region. Population projections are one of a number of elements used to develop a socio-economic portrayal of the area for the forecast of aviation activity.
6.2	State source for table 5.4-1 & 5.4-2 of EIS	City of Novato	The population projections for the City of Novato included in Table 4-5 were obtained from the City of Novato General Plan, adopted March 1996; and was the most recent population projection available at the time. The population projections for 2010, 2020, and 2030 for the counties of Marin, Sonoma, San Francisco, San Mateo, Napa, Alameda, Contra Costa, Solano, and Santa Clara in Table 4-5 and Table 5.4-1 were obtained from the State of California Department of Finance. The employment projections for Marin and Sonoma Counties in Table 5.4-2 were obtained from the California County Economic Forecasts: 2008 – 2030, prepared by the California Department of Transportation, dated August 2008.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
6.3	Reduce housing and employment data due to economic conditions	City of Novato	The commenter suggests that the annual growth rate of the projections "seems optimistic" and should be "reduced to reflect the existing data projections." However, these data projections were the most up-to-date data available at the time the EIS was started and no revisions to these projections are available. The projections remain reasonable estimates of housing and employment for the area. As such, the forecasts of aviation activity and the analysis of socio-economic impacts remain reasonable.
<b>7</b>	<b>Secondary</b>		
7.1	Evaluate induced impacts from increase in demand that would result from runway extension	USEPA	See Master Response, Topic 4.
<b>8</b>	<b>Air Quality</b>		<i>No Air Quality Comments Received</i>
<b>9</b>	<b>Water Quality</b>		
9.1	The project will impact a water line on airport	North Marin Water District	The Final EIS was updated to reflect the impact on the water line.
9.2	Regarding page 4-4-19 of the Draft EIR, there is no knowledge of RLI mitigating water quality impacts using gas monitoring and control programs	County of Marin – Community Development Agency (MARIN)	This comment is specific to a paragraph of the Marin County EIR that was not included in the Draft EIS, so this comment is not applicable to the EIS.
9.3	Additional flows of Olompali runoff not illustrated and there is no discussion in how they will change with the extension	Marin Conservation League	Water flows from Olompali State Historic Park will not be altered by the Sponsor's Proposed Project. Water will continue to enter on the west side of the Airport as it does today. The modifications to water flows will occur on Airport property with a northern extension of channels on either side of the levees and then reconnect with the existing system on the east side of the Airport as shown in Alternative B in Exhibit 3-3, and Alternative D in Exhibit 3-5 in Section 3.4.1 of the Final EIS.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
9.4	Is there any testing of the runoff	Marin Conservation League	DVO tests the out flow of runoff monthly and turns in the results annually to the California Regional Water Quality Control Board. Herbicide application is controlled and managed by an external vendor in compliance with all local and state requirements. The Final EIS has been updated to state this.
<b>10</b>	<b>Section 4(f)</b>		
10.1	Noise and safety at Olompali should be evaluated	Marin Conservation League	<p>Potential impacts to U.S. Department of Transportation Section 4(f) resources, including Olompali State Historic Park, are addressed in Section 5.7 of Chapter Five, <i>Environmental Consequences</i> of the Final EIS. As noted in Section 5.7.3, the Olompali State Historic Park would not be impacted by noise at or above the 65 CNEL Federal significance level for noise under Alternative A, Alternative B, or Alternative D.</p> <p>Flight routes and procedures at DVO will not change with regard to Olompali State Park. These flight tracks are located east of Olompali State Historic Park and do not directly overfly the park.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTS	RESPONSE
10.2	Include Marin Audubon Society property in 4(f) analysis	Marin Audubon Society	Federal Department of Transportation Section 4(f) evaluations only apply to Federal projects relative to publicly owned parks and recreation areas, regardless of the ability of the public to use the facilities. Because the Marin Audubon Society is not a public entity, property owned by the society is not evaluated under DOT Section 4(f). Potential environmental affects to all areas, including the Marin Audubon Society property are included in other sections of the Final EIS. However, the Marin Audubon Society property is located in an area adjacent to and surrounded by other properties considered in the DOT 4(f) analysis. The use of the Audubon property is virtually the same as many of these other properties (open space). None of the identified DOT Section 4(f) properties, even the ones located closer to the Airport than the Audubon property, are significantly impacted by Alternative A, Alternative B, or Alternative D.
10.3	Rush Creek is a popular multi-use path and noise from low flying planes is disturbing to both humans and animals.	Barbara Rozen	Potential impacts to U.S. Department of Transportation Section 4(f) resources, including Rush Creek, are addressed in Section 5.7 of Chapter Five, <i>Environmental Consequences</i> of the Final EIS. As noted in Section 5.7.3, Rush Creek would not be impacted by noise at or above the 65 CNEL Federal significance level for noise.
<b>11</b>	<b>Historic</b>	<b>No Comments</b>	<i>No Historic Resources Comments Received</i>
<b>12</b>	<b>Fish, Wildlife, and Plants</b>		
12.1	The current status of state listed species was not presented properly	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, the Final EIS provides the current state of California state-listed species in Chapter Four, <i>Affected Environment</i> , Table 4.14.
12.2	Need to include discussion of white-tailed kite	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, the Final EIS Chapter Four, <i>Affected Environment</i> , Table 4.14, and <i>Section 5.9</i> discuss the white-tailed kite.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
12.3	Appropriate mitigation needs to be in place to avoid "take" of protected species	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, the Final EIS addresses protective and habitat compensation measures for protected species in Section 5.9.4 and 5.9.5.
12.4	Address migratory wildlife corridors & impacts	California Department of Fish & Game, Barbara Rozen	The comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, impacts to movement corridors of protected species are addressed in Section 5.9.4.
12.5	Address Department of Fish and Game Wildlife Area	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, the Burdell Unit of the California Department of Fish and Game Petaluma Marsh Wildlife Area are discussed in Sections 4.6 and Section 5.7 of the Final EIS.
12.6	Protocol surveys for burrowing owls should be conducted using California Burrowing Owl Consortium Protocol and documented in biological report to be submitted to DFG for review	California Department of Fish & Game, Marin Audubon Society	The comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. Section 5.9.4 of the Final EIS has been updated to identify mitigation measures specific to the Burrowing Owl.
12.7	CDFG recommended modifying the burrowing owl mitigation measures identified in the Draft EIR.	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, protective and habitat compensation measures for fish, wildlife, and plants, including the burrowing owl, are provided in Section 5.9.4 of the Final EIS. Marin County has met with CDFG and has revised and updated the mitigation measures for the Burrowing owl from that meeting. See Section 4.5 in the Final EIR.
12.8	CDFG recommended modifying the migratory bird mitigation measures identified in the Draft EIR.	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, protective measures for migratory birds are identified in Section 5.9.3 of the Final EIS.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
12.9	Appendix I stated 2.38 acres of aquatic habitat would be permanently impacted. This appears to be a discrepancy when compared to Section 4.5 of the Draft EIR. Address the discrepancy in impacts to aquatic resources	California Department of Fish & Game	This comment by the California Department of Fish and Game was on the Draft EIR, not the Draft EIS. However, the Biological Assessment in Appendix I, <i>Biological Resources</i> , of the Final EIS has been updated to remove the discrepancy between the Final EIS text and the Appendix I, <i>Biological Resources</i> .
12.10	The discussion on page 4-68 reports that man-made drainages and the brackish marsh area north of the runway are habitat for the endangered salt marsh harvest mouse (SMHM) and that endangered clapper rails could seasonally forage in areas to the south. We agree, and also note that portions of the site likely provide high-tide refuge habitat for both of these species.	Marin Audubon Society	This comment is consistent with the analysis in the Final EIS. The FAA concurs the site provides high tide refugia habitat for the SMHM and California clapper rail.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
12.11	The species list should also include California Black Rail, a threatened species, which inhabits nearby Black John slough.	Marin Audubon Society	The Detailed Study Area was developed based on where direct impacts were likely to occur to resources. The USFWS and CDF&G agreed with the delineation of the Detailed Study Area. Black John Slough is not located within the Detailed Study Area, which was the geographic boundary used for identifying Federal and state species that could potentially be impacted by the Sponsor's Proposed Project (see Exhibit 4-3 in Chapter Four, <i>Affected Environment</i> , of the Final EIS). As such, species that inhabit Black John Slough but not the detailed study area, like the California black rail, were not considered in the evaluation of potential species impacts.
12.12	Mitigation should be provided for temporary and permanent removal of SMHM and a figure showing SMHM habitat should be included in the Final EIS.	Marin Audubon Society	Section 5.9.4 and 5.9.5 of the Final EIS describe protective and habitat compensation measures for the SMHM. The entire Detailed Study Area, minus the man-made hard surfaces, is potential habitat for the salt marsh harvest mouse and this area is discussed in Section 5.9.3 of the Final EIS and shown in Exhibit 5.9-1 and 5.9-2.
12.13	Mitigation 4.5-2d states that Construction Impacts would be mitigated by doing the work during summer and fall dry periods. The CCR non-breeding season, and therefore the allowable work window, usually does not begin until September 1 and extends through January.	Marin Audubon Society	As discussed in Section 5.9.4 of the Final EIS, the CCR habitat identified by the USFWS within the detailed study area is foraging habitat and not breeding habitat. Therefore, no CCR breeding seasonal restrictions are necessary to avoid disturbing nesting CCR as they do not nest in the construction area.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>13</b>	<b>Wetlands</b>		
13.1	None of the mitigation sites are currently approved CWA 404 mitigation banks. A mitigation proposal containing all the elements listed at §230.94 of the 2008 Mitigation Rule will need to be submitted to the Corps and EPA for review and approval.	USEPA	Section 5.10 of the Final EIS has been updated to include a thorough discussion of the compensatory mitigation requirements for Clean Water Act, Section 404 permits and additional discussion of possible compensatory mitigation sites.
13.2	Mitigation Ratio should be higher, 3:1 suggested	USEPA, California Department of Fish & Game, Marin Audubon Society, Marin Conservation League	Compensatory mitigation ratio for environmental impact evaluation identified in the Final EIS is 3:1. The final mitigation requirements for wetlands and waters in CWA jurisdiction will be established during the CWA Section 404 permit process.
13.3	Conceptual Mitigation plan should be included in the Final EIS	USEPA, Marin Audubon Society	Conceptual mitigation options have been added to Section 5.10 of the Final EIS.
13.4	Mitigation for Semi-permanent impact from construction should be proposed	California Department of Fish & Game	The USFWS Biological Opinion established compensatory habitat mitigation for short and long term temporary impacts to habitat for the salt marsh harvest mouse and California clapper rail. These compensatory habitat mitigation measures have been added as mitigation measures to Section 5.9 of the Final EIS.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
13.5	Appendix I stated 2.38 acres of aquatic habitat would be permanently impacted. This appears to be a discrepancy when compared to Section 4.5 of the Draft EIR. Address the discrepancy in impacts to aquatic resources	California Department of Fish & Game	Impacts to wetlands have been clarified and the discrepancy resolved in Section 5.10 of the Final EIS.
13.6	Compensatory mitigation should be included for losses to waterways (drainage/channels)	California Department of Fish & Game	Section 5.10 in the Final EIS includes compensatory mitigation ratios for both linear and acreage impacts related to implementation of Alternative B or Alternative D. The final mitigation requirements for wetlands and waters in CWA jurisdiction will be established during the CWA Section 404 permit process.
13.7	Include figures/charts to disclose existing and proposed drainage features	California Department of Fish & Game, Marin Audubon Society	Section 5.10 in the Final EIS was updated to address the location of water resources that will be impacted and created as part of the project.
13.8	Which agencies jurisdictional area is to be replaced at 2:1	California Department of Fish & Game	The term jurisdictional at this location refers to the US Army Corps of Engineers, who has jurisdiction over waters of the United States.
13.9	Construction of .77 acres of ditch/canal not be considered "in kind"	California Department of Fish & Game	Comment noted. The final mitigation requirements for wetlands and waters in CWA jurisdiction will be established during the CWA Section 404 permit process. However, as the ditch/canal habitat is the same type of habitat that is being disturbed, it can be considered an in-kind replacement of habitat.
13.10	Relocation of the ditch may require a LSAA	California Department of Fish & Game	Comment noted. If a LSAA agreement is required, Marin County will work with CDFG to coordinate this process.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
13.11	Mitigation should be in Marin County/close to site of loss	Marin Audubon Society, Marin Conservation League	Comment noted. As habitat compensation for both the California clapper rail and salt marsh harvest mouse requires off-site habitat compensation, and these species prefer tidal salt marsh, it is likely that Marin County will choose to coordinate the wetland mitigation requirements identified in the CWA Section 404 permit with the habitat compensation requirements of the USFWS Biological Opinion. The USFWS Biological Opinion identifies that the USFWS would likely increase the habitat compensation ratios for Alternative B or Alternative D if the proposed off-site restoration area was outside of the San Pablo Bay Recovery Unit identified in the <i>Draft Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California</i> . As the San Pablo Bay recovery Unit extends from Gallinas Creek in Marin County (at the southwestern end of the recovery unit) around San Pablo Bay north and east to Mare Island in Solano County, Marin County would likely attempt to locate the compensatory habitat mitigation site within or near Marin County to minimize mitigation requirements.
13.12	Mitigation should be provided for wetlands that are temporarily lost.	Marin Audubon Society	Wetland mitigation for temporary and permanent wetland impacts is discussed in Section 5.10.6 of the Final EIS.
13.13	Disagree with priority for mitigation	Marin Audubon Society	The order of mitigation preference is established by the USACOE regulations at 33 CFR 332.3 and provided as information in the document. The final mitigation requirements for wetlands and waters in CWA jurisdiction will be established during the CWA Section 404 permit process.
13.14	Agree with mitigation at private site	Marin Audubon Society	Comment noted. The final mitigation requirements for wetlands and waters in CWA jurisdiction will be established during the CWA Section 404 permit process.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
13.15	What is the amount of wetlands on south to be filled & why is it to be filled	Marin Audubon Society	0.33 acres of wetlands would be filled on the south end of the runway under the Sponsor's Proposed Project. The purpose of this is to allow for the creation of an FAA standard Runway Safety Area. The dimensions for the Runway Safety Areas were discussed in Section 2.2 of the Final EIS.
13.16	The habitat north of the runway does not typically support song sparrows or marsh wren.	Marin Audubon Society	The FAA agrees with the comment, however the biologists did observe these species (song sparrow and marsh wren) onsite and that is why they were discussed. Their presence was likely due to the remnant tidal marsh conditions and may not be representative of the typical resident species in the site's current conditions. This section has been updated to more accurately reflect typical habitat but keeps the species listed in the species list as species observed on-site.
13.17	Object to mitigation using banks and in-lieu fee	Marin Audubon Society	The commenter disagrees with the priority of mitigation identified in the Final EIS. This order of mitigation preference is established by the USACOE regulations at 33 CFR 332.3 and provided as information in the document. The final mitigation requirements for wetlands and waters in CWA jurisdiction will be established during the CWA Section 404 permit process.
13.18	General concern regarding loss of wetlands	Barbara Rozen	Comment noted. The Final EIS section 5.10 evaluates the effect of the Sponsor's Proposed Project and alternatives on wetlands and describes wetland mitigation measures.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
13.19	FAA Advisory Circular 150/5200-33B – requires that expansion of an existing airport into or near wetlands requires preparation of a Wildlife Hazard Management Plan	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	FAA Advisory Circular (AC) 150/5200-33B, <i>Hazardous Wildlife Attractants on or Near Airports</i> , does not require an airport to have a Wildlife Hazard Management Plan. FAA recommends that airports use the standards and practices contained in the FAA AC to address wildlife hazard conflicts. However, if an airport has experienced certain triggering events, the FAA may require a Wildlife Hazard Assessment. The Wildlife Hazard Assessment may or may not recommend the development of a Wildlife Hazard Management Plan. The FAA AC states that airports receiving Federal grant-in-aid assistance are required by their grant assurances to take appropriate actions to restrict the use of land next to or near the airport to uses that are compatible with normal operations. Appendix O, <i>Land Use Assurance Letter</i> of the Final EIS includes a letter from the Marin County Community Development Agency stating that "the County of Marin provides assurance that appropriate action and enforcement of zoning laws has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the vicinity of Gness Field Airport to activities and purposes compatible with normal airport operations."
13.20	More thorough discussion needed of the wetlands to be filled, how they interrelate with each other and other wetlands	Susan Stompe	Appendix I, <i>Biological Resources</i> and Appendix J, <i>Wetlands</i> , include detailed information regarding the wetlands on the site.
<b>14</b>	<b>Floodplains</b>		
14.1	Building elevation requirements	Federal Emergency Management Agency	There are no buildings being proposed, therefore the finished-floor elevation requirements do not apply to the Sponsor's Proposed Project.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
14.2	If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels.	Federal Emergency Management Agency	The area of construction being proposed is not located within a Regulatory Floodway; therefore base flood elevation level requirements do not apply to the Sponsor's Proposed Project.
14.3	Address Sea level rise and climate change	USEPA, Marin Conservation League, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Edward Mainland, Steve Knecht on behalf of Gnost Field Community Association	Although there are no Federal standards for aviation related greenhouse gas (GHG) emissions, it is well established GHG emissions can affect climate. The Council on Environmental Quality (CEQ) has indicated that climate should be considered on NEPA analysis. As noted by CEQ however, "it is not currently useful for the NEPA analysis to link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions, as such direct linkage is difficult to isolate and understand." Estimates of GHG emissions associated with the project alternatives were included in Appendix F, <i>Air Quality</i> of the Final EIS and have been added to Section 5.5 of the Final EIS. The Final EIS discusses sea level rise in Section 5.11, <i>Floodplains</i> and climate change in Section 5.5.5.4 <i>Assessment of Climate Change</i> .
14.4	Disclose impacts to increase pump operation and propose mitigation	California Department of Fish & Game	The environmental analysis did not identify any significant impacts associated with increase in stormwater runoff from the Sponsor's Proposed Project. The project design includes an extension of existing drainage ditches to accommodate the increase in stormwater runoff. These ditches will discharge stormwater through the existing outflow culvert. As a result the peak volume of stormwater discharge will remain unchanged but there would be a marginal increase in duration of stormwater discharge. This is not a significant impact.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
14.5	Pumping costs incurred from relocation of ditch should be agreed to with DFG	California Department of Fish & Game	Comment noted.
14.6	More discussion of levee roads, routes & mitigation	California Department of Fish & Game	CDFG has a floating access easement over the airport property and currently uses the existing levee around the airport to access their property. Marin County anticipates that the CDFG will continue to access its property via the new levee extension.
14.7	Meeting to discuss levee and pump costs with DFG	California Department of Fish & Game	Comment noted.
14.8	Consider water table rise, soil survey, construction considerations	Marin Conservation League	A Preliminary Soils Report was prepared for the proposed runway extension project and the height of the water table is discussed in Appendix M, <i>Geology, Soils, and Seismicity Resources</i> in Volume 3.
14.9	Building foundation requirements	Federal Emergency Management Agency	There are no buildings being proposed, therefore the requirements associated with coastal high hazard areas do not apply to the Sponsor's Proposed Project.
14.10	Marin County must submit appropriate hydrologic and hydraulic data to FEMA for a MIRM revision no later than 6 months after such data becomes available.	Federal Emergency Management Agency	Marin County will comply with this requirement after construction of the Sponsor's Proposed Project.
14.11	Local building restrictions may apply	Federal Emergency Management Agency	The Sponsor's Proposed Project is consistent with Marin County flood zone development regulations as described in Section 5.11 Floodplains in the Final EIS.
<b>15</b>	<b>Energy/Public Services</b>	<b>No Comments</b>	<i>No Energy/Public Services Comments Received</i>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>16</b>	<b>Light</b>		
16.1	Discuss small change in lighting to communities	Wright Bass	Section 5.16 in Chapter Five, <i>Environmental Consequences</i> , of the Final EIS discusses the potential light impacts associated with the alternatives, including the Sponsor's Proposed Project. The Final EIS discusses the potential changes in lighting that would occur and concluded that there would be no significant change in light impacts to the communities.
16.2	Beacon lights are impacts, offer mitigation	Dr. Richard Levy, Rosario Carr-Casanova	There is currently a beacon light at DVO. NEPA requires the evaluation of new impacts associated with the Sponsor's Proposed Project and alternatives. The existing beacon light will remain at its current location in all alternatives including the No Action alternative, and therefore there will be no change in lighting from the beacon light associated with the Sponsor's Proposed Project. Therefore, there is no new impact associated with beacon lights and no mitigation is required under NEPA.
<b>17</b>	<b>Redwood Landfill</b>		
17.1	Redwood Landfill Incorporated is a 420 acre site	Marin County	The document has been updated accordingly.
17.2	Solid waste collected by Novato Disposal	Marin County	The document has been updated accordingly.
17.3	Permitted maximum height and max capacity of RLI	Marin County	The document has been updated accordingly.
17.4	RLI is located 3000 feet northwest	Marin County	The document has been updated accordingly.
17.5	Project was approved when RLI's permit was revised in 12/08	Redwood Landfill, Marin County	The document has been updated accordingly.
17.6	Marin County has no authority over solid waste facility permit conditions.	County of Marin – Community Development Agency (MARIN)	The document has been updated accordingly.



COMMENT #	COMMENT/SUBJECT	COMMENTS	RESPONSE
17.7	RLI's working face assumption is incorrect	Redwood Landfill, Marin County	The document has been updated accordingly.
17.8	RLI was issued a revised permit not a new solid waste permit	County of Marin – Community Development Agency (MARIN)	The document has been updated accordingly.
17.9	Cannons no longer used at RLI	County of Marin – Community Development Agency (MARIN)	It is understood that RLI no longer chooses to use the propane gas cannon to scare birds away from the RLI. However, the propane gas cannon is discussed as mitigation measure 3.6.2a included with the 2008 permit as one of the methods that may be used to discourage birds at RLI. The mitigation measure 3.6.2a in the permit states, "RLI also may use a gas-fired cannon, which emits a loud blast, in conjunction with the pyrotechnic devices. Redwood Landfill periodically re-evaluates and revises bird control techniques as necessary." The Final EIS has been updated to reflect that the propane gas cannon is available to be used versus actively being used.
17.10	Update the discussion regarding 2008 SWF permit to indicate that a lateral increase in the landfill working face, increase in composting activity, and increase in nighttime activity, although considered in the RLI Landfill EIR, were not approved in the 2008 SWF permit.	Redwood Landfill	The document has been updated accordingly.
<b>18</b>	<b>Construction</b>		
18.1	Include increased trucks hauling soil during construction	Marin Audubon Society	The temporary increase in trucks for construction is addressed in Final EIS Section 5.18 <i>Construction Impacts</i> .



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
<b>19</b>	<b>Safety</b>		
19.1	No discussion of pilot safety or health in EIS	USEPA	Comment 19.1 requests a discussion of Bird/Aircraft Strike Hazards and Pilot Safety as related to Bird Aircraft Strike Hazards. This issue is addressed in the response to Comment 5.1.
19.2	Discuss past airplane mishaps and project increase of them due to project	City of Novato, Marin Audubon Society	As described in the FAA May 14, 2013 Fact Sheet – <i>General Aviation Safety</i> <sup>3</sup> and repeated here, the United States has the largest and most diverse General Aviation (GA) community in the world with more than 300,000 aircraft including amateur-built aircraft, rotorcraft, balloons, and highly sophisticated turbojets. While the number of fatal general aviation accidents (nationally) over the last decade has gone down, so have the estimated total GA flight hours, likely due to economic factors. Over the past three years, fatal accidents (nationally) from Controlled Flight into Terrain (CFIT) have been reduced by more than 50 percent compared to the previous three years. However, the general aviation fatal accident rate appears to have remained relatively static based on the FAA's flight hour estimates. The preliminary estimate for Federal Fiscal Year 2012 (October 2011 to September 2012) is a fatal accident rate of 1.09 fatalities per 100,000 hours flown. The accident rate for Federal Fiscal Year 2011 (October 2010 to September 2011) was 1.13 fatal accidents per 100,000 hours flown and was 1.10 fatal accidents per 100,000 hours flown in Federal Fiscal Year 2010 (October 2009 to September 2010). The Top 10 Leading Causes of Fatal General Aviation Accidents from Year 2001 – 2011 are 1.) Loss of Control Inflight; 2.) Controlled Flight Into Terrain; 3) System Component Failure – Powerplant; 4) Low Altitude Operations; 5) Unknown or Undetermined; 6) Other; 7) Fuel Related; 8) System Component Failure – Non-Powerplant; 9) Midair

<sup>3</sup> FAA Fact Sheet – General Aviation Safety dated May 14, 2013. [www.faa.gov/news/fact\\_sheets/news\\_story.cfm?newId=13672](http://www.faa.gov/news/fact_sheets/news_story.cfm?newId=13672)



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
			<p>Collisions; and 10) Windshear or Thunderstorm.</p> <p>Reducing GA fatalities is a top priority of the FAA and the FAA's goal is to reduce the GA fatal accident rate by 10 percent over the 10-year period (2008-2019). Loss of Control (of an aircraft in flight) – mainly stalls – accounts for approximately 40 percent of fatal GA accidents.</p> <p>Review of recent incidents at DVO finds that most are aircraft that have had mechanical failure. Other incidents have included blown tires and runway lights being hit from airplanes being pushed to the sides of the runway caused by unpredictable crosswinds. It is impossible to predict aircraft mishaps, particularly when many are caused by mechanical failure. However, as pilots would have more runway to utilize in case of poor weather or unfavorable wind conditions (potentially reducing the number of blown tires), as well as to correct for crosswinds that sometimes occur at DVO (potentially reducing the number of lights being hit) safety would be enhanced by extending the existing runway, and increasing the size of existing Runway Safety Areas to meet ARC B-I standards.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTS	RESPONSE
19.3	No discussion of safety regarding proximity to Highway 101 and SMART tracks	Marin Conservation League	<p>The FAA has recommendations for separation distances between runway, taxiways, and off-airport features. These are found in FAA Advisory Circular 150/5300-13A <i>Airport Design</i>. The Sponsor's Proposed Project meets all separation distance requirements with respect to the proximity to roads and railroad tracks to the runway. The FAA also has specific guidance regarding the height of objects/obstructions near an airport. These are found in 14 CFR Part 77. The Sponsor's Proposed Project meets all FAA standards related to the height of the roads and railroad tracks near the Airport.</p> <p>The commenter asked if aircraft could be required to take off as far south as possible when taking off to the north (i.e. starting at the Runway 31 end to take off to the north). It is standard procedure for airplanes to only initiate takeoffs from an end of a runway, with only one airplane using the runway at a time. An airplane using Runway 31 taking off to the north would wait for its turn on a taxiway, then would start its takeoff roll at the same location on Runway 31 under Alternative A – No Action, or Alternative B – the Sponsor's Proposed Project. Under Alternative D, an aircraft taking off on Runway 31 to the north would start its takeoff roll 240 feet south of the current end of Runway 31.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
19.4	The runway extension will add safety (turns before radio towers, additional runway length during power failure, crosswinds, bird strikes)	Gnoss Field Community Association, Wright Bass, Charles Roell, Sanford Gossman, Jim Duckworth, Joyce Wells, Steve Knecht on behalf of Gnoss Field Community Association, Rich Elb, Kirk Heiser	Comment noted.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
19.5	Increase in jets should be unacceptable to FAA because it is an uncontrolled airport (no control tower) with mix of jets and props	Robert Pack	Non-towered airports are common in our nation's aviation system and turbojet (jet) airplanes and propeller driven (turbo-prop and piston) aircraft have operated concurrently at DVO for many years. Existing flight procedures and pilot communication protocols are designed to ensure safety at non-towered airports with a mix of turbojet and propeller aircraft and will continue to be used regardless of whether or not the runway is extended at DVO. As discussed in Master Response Topic 1, Aviation Forecast, increasing the runway length at DVO is not expected to change the fleet mix of aircraft that operate at DVO. The commenter provides no basis for his statement that the FAA should consider a mix of turbojet and propeller-driven aircraft to be unacceptable. In addition, the FAA regulations at 14 CFR § 170 <i>Establishment and Discontinuance Criteria for Air Traffic Control Services and Navigational Facilities</i> and FAA Office of Aviation Policy and Plans report FAA-APO-90-7 <i>Establishment and Discontinuance Criteria for Airport Traffic Control Towers</i> identify the process by which the FAA determines whether an airport qualifies for an Airport Traffic Control Tower. The FAA regulations do not use the presence or absence of concurrent use of an airport by turbojet and propeller-driven aircraft as the basis for determining whether an airport qualifies for establishment of an Airport Traffic Control Tower.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
19.6	Slow GA and training aircraft are not compatible with jets in an airport environment. The safety of 99% of the aircraft is compromised for a marginal benefit to the 1%.	Robert Pack	Airports across the country routinely accommodate both pilot training activity and jet activity. DVO accommodates both pilot training and jet activity today and would continue to in the future. There would be no reduction in safety related to training pilots with the extension because the same procedures used today for maintaining safe separations would continue to be used in the future. In fact, with the Sponsor's Proposed Project, pilots would have more runway to utilize in case of poor weather or unfavorable wind conditions that sometimes occur at DVO.
19.7	There will be a decrease in level of safety	Patricia Capretta	There would not be a reduction in safety related to the proposed extension. In fact, there would be an enhancement in safety as pilots would have more runway to utilize in case of poor weather or unfavorable wind conditions that sometimes occur at DVO.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
20	Runway Performance/Wind		
20.1	Add detail on aircraft that will benefit from the extension and who is limited currently	Dr. Richard Levy, Rosario Carr- Casanova, Jeanette Weber, Duncan & Betsy Ross, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews, Jacqueline Bonner	<p>Please see Master Response, Topic 2 regarding the requirements the FAA must follow regarding the purpose and need for airport improvements. Chapter Two, <i>Purpose and Need</i> of the Final EIS has been clarified to more clearly state Marin County's (Sponsor's) and the FAA's purpose and need for the project. The Sponsor's purpose and need for the project is to allow existing aircraft, as represented by the critical aircraft at DVO, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions.</p> <p>The FAA's statutory mission and purpose and need is to ensure the safe and efficient use of navigable airspace in the U.S. The FAA must ensure that the proposed project does not derogate the safety of aircraft and airport operations at DVO.</p> <p>The Sponsor's and FAA's purpose and need is consistent with FAA Order 5090.3C, <i>Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)</i>, which identifies that airport dimensional standards such as runway length and width, separation standards (distances) between runways and taxiways, surface gradients, and similar dimensions should be selected to be appropriate for the "critical aircraft" that will make "substantial use" of the airport in the planning period for improvements.</p> <p>The Appendix D, <i>Runway Length Analysis</i> in the Final EIS and Final EIR, has been clarified regarding the required runway length for the critical aircraft. The runway length analysis concluded a total runway length of 4,400 feet is required for the critical aircraft, the Cessna 525. Project alternatives that do not provide for a total runway length</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
			<p>of 4,400 feet do not meet the purpose and need for this project and are not reasonable and prudent. Alternatives that are not reasonable and prudent do not need to be evaluated in detail in the Final EIR.</p> <p>A determination of whether or not other aircraft may benefit from the proposed runway extension is not required as part of the determination of the purpose and need for this project, nor the environmental analysis of this project. Appendix D, <i>Runway Length Analysis</i> has been clarified to be specific to the critical aircraft, the Cessna 525, and references to other aircraft that may benefit from the runway extension have been removed from Appendix D, <i>Runway Length Analysis</i> as not relevant to the determination of the appropriate runway length for DVO.</p>
20.2	<p>The Draft EIS states that the proposed extension "would not attract aircraft that are notably larger (i.e. commuter aircraft) due to the limitations of the strength of the runway pavement width of the runway, and the distance between the runway and the taxiway." What is the current strength of the runway pavement? Why couldn't the runway simply be resurfaced?</p>	Marin Audubon Society	<p>The existing pavement strength for the runway at DVO is 26,000 pounds. This will not be changed as part of the Sponsor's Proposed Project. Simple resurfacing would not substantially alter the pavement strength of the runway. In order to increase the pavement strength, additional work would have to occur to strengthen the sub layers beneath the top surface, and such changes are not proposed as part of this project.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
20.3	Include a list of aircraft that can use 4,400 foot runway	Susan Stompe	The purpose of the Sponsor's Proposed Project is to allow existing aircraft at DVO, as represented by the critical aircraft, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions. The runway length determination is based on an evaluation of the needs of the critical aircraft, not a listing of other aircraft that may potentially benefit from the project. Such a listing is not necessary to evaluate the environmental impacts of the project.
20.4	Extension allows full load of fuel and passengers	Charles Roell, Jim Duckworth	Comment noted.
20.5	Wet runway safety needs to be presented with supporting accelerate-stop data for jets, turbo-props, piston twins and even high-performance single engine airplanes likely to use Gnos.	Wright Bass	The Sponsor's Proposed Project would meet all runway safety area dimensions set forth in FAA Advisory Circular 150/5300-13A. Runway safety areas are designed to provide safe stopping distance for an aircraft that overshoots the standard runway landing threshold or for an aircraft that requires additional accelerate-stop distance beyond the end of the runway. The size (width/length) of the RSA is based on the Airport Reference Code of the airport, which is based in large part on the requirements for the 'critical aircraft' (most demanding aircraft with at least 500 annual operations). Ultimately, it is the pilot that determines if the runway conditions (wet versus dry) and weather (visibility, temperature, winds, etc.) are suitable for their particular aircraft to operate at any given time.
20.6	Post-project, would current users be able to operate no matter how high the temperature? What other weather conditions besides hot weather would impact operations?	Marin Audubon Society	See Master Response, Topic 2 and Appendix D, <i>Runway Length Analysis</i> for an explanation of what factors were used in the determination of the runway length for the critical aircraft including a discussion of temperature and wet versus dry runways as it relates to the runway length analysis for DVO.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
20.7	DVO used primarily by students to train in crosswinds therefore the runway should not be extended	Robert Pack	The purpose of the Sponsor's Proposed Project is to allow existing aircraft at DVO, as represented by the critical aircraft, the Cessna 525, to operate at Maximum Gross Take Off Weight under hot weather and other adverse weather conditions. The runway length determination is based on an evaluation of the needs of the critical aircraft, not an evaluation of a group of users that visit the airport for a particular activity.
20.8	Cessna Jet+ is critical aircraft and needs only 3,800 foot runway (using 82 degrees rather than 86)	Leslie & Chris Weber, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	This comment is addressed in Master Response, Topic 2 – Runway Length Analysis Response and Appendix D – Runway Length Analysis. Appendix D, Table D-1, Table Note iv explains the use of the Airport Planning Manual (APM) for the critical aircraft, and that a Cessna Aircraft Company Senior Customer Support Engineer advised the EIS consultant that since the Cessna 525 APM only listed a runway length for an average daily temperature of 86 degrees Fahrenheit, that the appropriate way to calculate the required length was to use the 86 degree Fahrenheit temperature figure in the APM.
20.9	FAA runway length guidelines not used/mentioned properly(FAA AC 150/5325-4B)	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	References to Advisory Circular 150/5325-4B have been added to Appendix D, <i>Runway Length Analysis</i> . See Master Response, Topic 2 and Appendix D, <i>Runway Length Analysis</i> for a detailed discussion of the runway length analysis methodology and guidelines.
20.10	Error using B-II aircraft in runway length analysis/Cessna 525A &B	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	The tables and charts included in Appendix D, <i>Runway Length Analysis</i> , presented the current fleet operating at DVO for information purposes. There are B-II aircraft that operate at DVO, but they are not the critical aircraft as defined by the FAA. The critical aircraft, the Cessna 525, is a B-I aircraft and was used for the runway length analysis. The Cessna 525A and Cessna 525B were not the critical aircraft. Appendix D, <i>Runway Length Analysis</i> has been updated to reflect the Cessna 525A and Cessna 525B as B-II aircraft.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
20.11	Need more data to support that the CJ+ is the critical aircraft	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	Attachment 1 has been added to Appendix D, <i>Runway Length Analysis</i> to provide a detailed explanation of how the Cessna 525 was determined to be the critical aircraft for DVO.
20.12	No background/support given for the additional 400 ft. of runway	Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	See Master Response, Topic 2 and Appendix D, <i>Runway Length Analysis</i> .
20.12a	Abnormal day which is used to argue for adding 400 more feet, is not defined (and likely negatively correlated with hot days)	Steven Nebb	See Master Response, Topic 2 and Appendix D, <i>Runway Length Analysis</i> .
20.13	For those aircraft based on Gness, (we believe there are only 4 or 5), having the longer runway would not mean more flights. It would mean more efficient and safer flights.	Gness Field Community Association	Comment noted.
<b>21</b>	<b>Transportation</b>		
21.1	A Transportation Management Plan may be required to address construction traffic during construction of the project	California Department of Transportation	Comment noted. If it is determined that a Transportation Management Plan is required, Marin County will coordinate with California Department of Transportation.
21.2	Coordinate with the DOT	California Department of Transportation	Comment noted.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
21.3	Transportation Permit required	California Department of Transportation	Comment noted. Once the final construction plan has been developed, Marin County will apply for the necessary permits.
<b>22</b>	<b>Cumulative</b>		
22.1	Fireman's Fund withdrawing applications therefore update population numbers and description	City of Novato	Population projections are estimates of changes in population over time. These projections assume growth based on new development will occur to support the growth. Projections are not based on one specific development proposal. While it is noted that the Fireman's fund application was withdrawn, it is assumed that other developments will occur. The project for the Fireman's Fund project has been removed from the Cumulative Impacts analysis in the Final EIS.
22.2	How does the extension relate to the planned Marin Jet Center	Gnoss Field Community Association, Dr. Richard Levy, Rosario Carr-Casanova, Jeanette Weber, Duncan & Betsy Ross, Steve Knecht on behalf of Gnoss Field Community Association	Marin County is not proposing nor does the County have any plans for a Jet Center at Gnoss Field. The Sponsor's Proposed Project relates directly to the Purpose and Need for providing current users, as reflected by the critical aircraft sufficient runway length. In the past, private development interests have discussed the idea of a Jet Center near the Airport property. However, no application has been filed with Marin County to date, and land use policies in the Marin Countywide Plan do not promote new development around Gnoss Field.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
22.3	Explain what the effects the extension will have in expansion of the airport in the future	Jacqueline Bonner	Sections 5.3 and 5.4 of the Final EIS address anticipated socioeconomic and induced changes at DVO as a result of the Sponsor's Proposed Project. Chapter Six, <i>Cumulative Impacts</i> addresses cumulative impacts of the Sponsor's Proposed Project. The Marin Countywide Plan includes policies related to limiting aviation uses at DVO (Policy TR-1p) to those consistent with general aviation, emergency, and similar public uses.
<b>23</b>	<b>General</b>		
23.1	Update lead agency contact info	California Department of Fish & Game	The document has been updated accordingly.
23.2	Maps need to be updated that show Bahia drive running through Valley Memorial Park	City of Novato	The document has been updated accordingly.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
23.3	Discuss how final project will be chosen	Marin Audubon Society	<p>There is both a Federal (NEPA) and state (CEQA) environmental review/approval process occurring for the Sponsor's Proposed Project. <b>Federal (NEPA):</b> FAA will review the information included in the Final EIS and will issue a Record of Decision stating the FAA preferred alternative, NEPA findings and their Decision on the proposed Federal Action. FAA follows guidance in FAA Orders 5050.4B and 1050.1E in selecting the preferred alternative. <b>State (CEQA):</b> CEQA requires that Marin County certify the Final EIR before making a decision on the Sponsor's Proposed Project. The Marin Board of Supervisors will hold a noticed public hearing before making a decision on the Sponsor's Proposed Project. The EIR certification meeting and the public hearing on the Sponsor's Proposed Project can be placed on the same agenda, but a decision on EIR certification must be made before the hearing on the proposed runway extension project. Marin County will then issue a Notice of Determination, which will include the decision of approval/disapproval in accordance with CEQA. If both of these approvals are obtained, then Marin County, as the airport sponsor, would determine if they wanted to move forward with design and construction.</p>



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
23.4	Review comments from scoping and address them	Redwood Landfill, Leslie & Chris Weber, Sharon Nebb, Steven Nebb, Christopher Gilkerson, Susan Mathews	Comments from the agency and public scoping were reviewed and taken into consideration during the development of the EIS. Specific agency and public comments are included in Appendix A, <i>Agency Scoping and Coordination</i> and Appendix B, <i>Public Involvement</i> . A summary of the comments received during the agency scoping period, responses to those comments, and, where applicable, the section of the Final EIS in which the comment is addressed, are included in Table A-1 in Appendix A, <i>Agency Scoping and Coordination</i> . A summary of the comments received during the public scoping period, responses to those comments, and where applicable the section of the Final EIS in which the comment is addressed, are included in Table B-1 in Appendix B, <i>Public Scoping</i> .
23.5	Is there a limit on the number of operations an airport can support without a control tower	Black Point Improvement Club	There is no FAA limit on the number of operations that an airport can support without a control tower. Also see Response to Comment 19.5.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
23.6	Can the airport be limited in who uses it	Black Point Improvement Club	Airports that accept Federal Airport Improvement Program grant funding agree to abide by certain conditions associated with that funding called Grant Assurances. Grant Assurance 22, Economic Nondiscrimination requires sponsors to make the airport available on reasonable terms and without unjust discrimination. Moreover, the Airport Noise and Capacity Act of 1990 requires airport sponsors seeking to establish aircraft noise and aircraft access restrictions to a specific airport to follow the FAA regulations at 14 CFR Part 161 (Part 161) <i>Notice and Approval of Noise and Access Restrictions</i> . Part 161 provides airports with a methodology to place limits on aircraft types and/or other restrictions, primarily for the purpose of reducing noise impacts. The methodology for an airport conducting a Part 161 evaluation of potential noise or access restrictions is to complete a cost-benefit analysis, where the benefit is the amount of money not spent to mitigate significantly noise-impacted land uses is weighed against the cost, which is the potential reduction in revenue and interstate commerce that would occur as the result of a restriction being placed at an airport. As no significant noise impacts have been identified under the Sponsor's Proposed Project, Alternative D, or the No Action Alternative, there is not currently a basis for restricting aircraft access to DVO to reduce noise. (See Chapter Five, <i>Environmental Consequences</i> , Section 5.1, <i>Noise</i> ).
23.7	Misspelling of name Silveira (not Sivera)	Anthony & Lorraine Silveira	The document has been updated accordingly.
23.8	RLI's operations under the 2008 permit are part of the baseline that must be used to compare impacts	Redwood Landfill	It is acknowledged that the RLI operations under the 2008 permit are part of the baseline. There is no additional mitigation (wildlife attractant measures) required beyond what is required in RLI's operating permit.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
23.9	Need to add a conclusion regarding noise, larger aircraft	Bob Spofford	A discussion of the noise analysis that was conducted for the Final EIS is included in Section 5.1 of Chapter Five, <i>Environmental Consequences</i> . The methodology used to conduct the analysis, including aircraft types that were used in the computer noise modeling, is included in Appendix E, <i>Noise</i> . As discussed in the Final EIS no residential or other noise-sensitive land uses would be exposed to noise levels of 65 CNEL (Federal significance standard) by implementing Alternative A, Alternative B, or Alternative D. Therefore, no significant noise impacts would result from implementation of Alternative A, Alternative B, or Alternative D. See Master Response, Topic 3.
<b>24</b>	<b>Support of Project</b>		
24	Expressed general support for the project	Gross Field Community Association, Jim Duckworth, Rod Mehrten, Steve Knecht on behalf of Gross Field Community Association	Comment noted.
<b>25</b>	<b>No Comment</b>		
25	No comment	California Air National Guard	N/A
<b>26</b>	<b>Soils</b>		
26.1	Settlement and fill discussion and concern on how it will occur	Marin Audubon Society	Prior to construction, a detailed construction design will be completed to address the potential settlement issues that may arise as a result of the project.



COMMENT #	COMMENT/SUBJECT	COMMENTER	RESPONSE
26.2	Concern of mitigation measures identified to address soil settlement including the effect of these measures on water quality, and endangered species.	Marin Audubon Society	Water quality impacts are addressed in Section 5.6 of the Final EIS, and endangered species impacts are addressed in Section 5.9 of the Final EIS. Marin County will follow all local, state, and Federal requirements regarding the introduction of chemicals into the soil as part of the construction process. Section 401 of the CWA (33 U.S.C. 1341) requires any Federal license or permit applicant to obtain a water quality certification if any proposed project activity may result in a discharge of a pollutants into waters of the U.S. This certification assures that the discharge would comply with the applicable effluent limitations and water quality standards.